

1 UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF NEW YORK
3 CASE NO. 19-CV-11764 (AT) (KHP)
4

5 ARLENE DELGADO,

6 Plaintiff,

7 vs.

8 DONALD J. TRUMP FOR PRESIDENT,
9 ET AL.,

10 Defendants.

11 LOCATION: Remote Audio-Video
12 Communication

13 DATE: May 7, 2024

14 TIME: 10:00 AM ET to 12:35 PM ET
15

16 Volume 2

17 CONTINUATION DEPOSITION OF BRADLEY PARSCALE

18 Taken before Leila Harris, LCR, Stenographic
19 Court Reporter, Notary Public State of Florida,
20 pursuant to Notice of Taking Deposition in the
21 above-styled cause.
22
23
24
25

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1 P R O C E E D I N G S

2 BRADLEY PARSCALE

3 was called as a witness, and after having been first
4 remotely duly sworn was deposed and testified as
5 follows:

6 THE WITNESS: Yes, ma'am.

7 THE STENOGRAPHER: All right. Thank you.

8 And I do have my quick little stipulation
9 just because this is a remote and the witness
10 and I are not in the room together.

11 Pursuant to stipulation, the oath
12 administered by me here today will have the
13 same force and effect as if it were being given
14 to the witness while they were physically
15 present before me in the State of Florida and I
16 were acting in my capacity as a Florida Notary.

17 Okay. We are all set to begin.

18 EXAMINATION

19 BY MS. DELGADO:

20 Q Okay. Good morning, Mr. Parscale.

21 A Hello. How are you?

22 Q Great, great.

23 MS. DELGADO: Oh, and -- sorry.

24 Leila, could we have a quick -- since I
25 missed it. Appearances were already done.

1 Who's on the -- on the Zoom? I missed the
2 appearances.

3 MR. WOODWARD: On behalf of Mr. Parscale,
4 you have Stanley Woodward and Jeffrey Gavenman.

5 MS. DELGADO: Thank you.

6 And Mr. Blumetti's on as well? I think
7 he's --

8 MR. BLUMETTI: Yeah.

9 MS. DELGADO: Okay. Thank you.

10 BY MS. DELGADO:

11 Q Okay. Mr. Parscale, same as last time, is
12 it okay if I refer to you as Brad?

13 A Please.

14 Q Okay. Thank you. Feel free to call me
15 AJ.

16 A Yep.

17 Q Same ground rules as last time. Any time
18 you need to take a break, just let me know.

19 MS. DELGADO: Same goes for anybody on the
20 Zoom. Leila, you as well. Breaks for water,
21 bathroom, calls, whatnot.

22 BY MS. DELGADO:

23 Q Please just don't discuss your testimony,
24 Brad, with your attorneys. I don't -- I know we
25 have three hours today. I don't imagine it will

1 take up to three hours. Most of this is just
2 questions I didn't get to last time; so hopefully,
3 the sooner we can conclude, we will.

4 **A I appreciate that.**

5 Q Sorry?

6 **A I said I appreciate that.**

7 Q Absolutely.

8 And if you notice that I'm jumping
9 around, it's probably just because it's a
10 continuation of the last deposition. It's not meant
11 to be a trick question. It's just a combination --

12 **A No worries.**

13 Q -- of that and my lack of organizational
14 skills. The same thing happened when I deposed
15 Kellyanne, so it's -- you'll notice I'm not going by
16 topic or by chronological order. That's just the
17 way my crazy notes are, so don't read into that.
18 Feel free.

19 Okay. And if you don't understand
20 any question, let me know. Or if I need to rephrase
21 anything, please let me know, and I'll rephrase it
22 so you understand it. And try not to answer with
23 uh-uh or uh-huh or shake of the head or a nod of the
24 head so the court reporter can get everything down
25 verbally.

1 **A Yes, ma'am.**

2 **Q Okay. Thank you.**

3 All right. Let's get started.

4 Brad, do you know the name Justin
5 Clark?

6 **A Yes, ma'am.**

7 **Q Who was Justin Clark? Or who is he, if**
8 **he's still alive?**

9 **A I don't remember his title. He worked in**
10 **the 2020 campaign. I don't remember if he worked in**
11 **the 2016 campaign. I can't remember.**

12 The 2020 -- he worked for me in 2020.
13 I don't remember his title, though. I don't know
14 what you mean by "who is he." He's a guy who worked
15 for me.

16 **Q Fair enough, yes.**

17 He worked with you. What did he do
18 on the 2020 campaign?

19 **A He worked with Bill Stepien to -- man.**
20 **Give me a second to -- I'm trying to remember.**

21 He worked back in the political
22 division and -- he did an assortment of things.
23 I -- he was kind of a -- a rover in some ways. I
24 couldn't tell you exactly what he did.

25 He -- he was Bill Stepien's assistant

1 in the political division that was mostly focusing
2 on state-based primary elections early on, focusing
3 on election integrity, things like that. You know,
4 back -- honestly, the least part I was connected to,
5 like, on a day-to-day basis. Like, it was -- it
6 was -- they would come up with these plans, and then
7 they would go implement them on the ground. Very
8 state mixed.

9 Q Was he also an attorney?

10 A I believe so, but I did not use him in
11 that capacity.

12 Q Right. I don't mean you personally.
13 Understood.

14 A Yeah.

15 Q Okay. Do you recall a name by Hannah
16 Castillo a name --

17 A Yes.

18 Q Okay.

19 A Yes.

20 Q What was her role in the campaign?

21 A She was my -- what's it called.

22 Like, Women for Trump, everything,
23 my -- my coalitions director. I can't remember her
24 exact title, but she was the director of coalitions
25 probably. I can't remember the title we gave her,

1 but something like that.

2 Q And did she continue working through the
3 election?

4 A I believe not. She exited the campaign, I
5 believe, after I did.

6 Q Why was that?

7 A I -- I was not there to know exactly why.
8 I -- she told me she left a month or two later,
9 mainly saying that the campaign was a whole
10 different operation after I left. But I can't --
11 she never gave me an exact purpose.

12 Q And do you recall that Ms. Castillo was a
13 new mom at the time? Had a -- had a young child?

14 A Yes. Yes, I did.

15 Q Approximately how old was the child?

16 A I mean, I think the -- she was born during
17 the campaign; and I remember her coming to me and
18 saying, I would like, you know -- I talked her into
19 staying with the baby, and she thought she would
20 have to quit, having the baby. And I talked her
21 into staying in the campaign and said that you could
22 bring your baby into the campaign. That's all -- I
23 remember -- she also was just months old when I
24 left.

25 Q Okay. And you said you don't know why she

1 left because she left after?

2 A She left after I left, but I'm -- I mean,
3 I didn't -- I didn't have a lot of transparency of
4 the operation of the campaign after I left.

5 Q Sure. Understood. That's fair. Okay.

6 Was Michael Cohen part of the
7 campaign in 2016?

8 A Can you ask more detail? Like, I don't
9 know if -- what -- in what capacity you mean. Like,
10 official employee? What are you asking me?

11 Q Would you consider Michael Cohen to be
12 part of the 2016 campaign as a staffer or an
13 independent contractor?

14 A He was there. I couldn't -- I wouldn't
15 have transparency to what his actual employment was
16 in the campaign, but he obviously was part of it.

17 Q At what point in 2016 did Kellyanne Conway
18 become the campaign manager?

19 A What month? Or what -- what were you...

20 Q Sure. That's terribly worded. I agree.

21 What month?

22 A Oh, you're testing me.

23 I can only guess, but it was after
24 convention, after Paul Manafort left.

25 My -- my --

1 Q So give me --

2 A If you want me to guess, I could guess
3 August, early September. But that would be a --
4 obviously, a guess. I just remember it was after
5 Paul Manafort left. But it's been ten years almost,
6 as you know.

7 Q And so -- and the campaign, when would you
8 say, what month and year did it begin, roughly?

9 A The exploratory committee or the campaign?

10 Q The campaign.

11 A Campaign started in -- two days before his
12 birthday, I believe, or two days after his birthday.
13 June of 2015.

14 Q So Kellyanne Conway would have entered a
15 little over a year later?

16 A Kellyanne did not enter until after Ted
17 Cruz. She was with Ted Cruz at the beginning of the
18 primary, I believe; and then -- I can't remember
19 when she showed up at the offices, but was not
20 really in an official capacity till -- as campaign
21 manager in title until after convention.

22 Q So that would be late summer 2016; is that
23 correct?

24 A I would -- I would agree with that
25 framing.

1 Q Okay. So would you agree that a woman was
2 not made campaign manager until over a year into the
3 election effort; is that accurate?

4 A Yes.

5 Q Okay.

6 A Corey was not a woman.

7 Q Nor was Paul Manafort, that I know of.

8 A Paul Manafort's title was campaign
9 chairman.

10 Q But he functioned as a campaign manager,
11 correct?

12 A Yes, ma'am.

13 Q Okay. Do you recall a woman named Corinna
14 from data or phone bank?

15 A I can't recall. It sounds familiar.
16 Can't recall.

17 Q Okay. Can you think of any examples of
18 what Kellyanne Conway did, if anything, to elevate
19 women during the campaign?

20 MR. BLUMETTI: Objection to form.

21 A I -- I -- can you be a little more --

22 MS. DELGADO: Jared, I'm happy --

23 A Can you be a little more specific?

24 MS. DELGADO: Sorry. I know there was an
25 objection to form. I'm happy to rephrase it if

1 you'd like to specify what's problematic.

2 MR. BLUMETTI: The use of the phrase "if
3 anything." It was just a little bit -- you
4 know, if you can give him specific examples.

5 THE STENOGRAPHER: Sorry. Who made that
6 objection?

7 MR. BLUMETTI: That was Jared Blumetti.

8 THE STENOGRAPHER: Okay. I'm sorry. For
9 some reason, Jared, you weren't lighting up, so
10 I apologize for that.

11 MS. DELGADO: Okay. I'll rephrase it.

12 BY MS. DELGADO:

13 Q Can you give me any examples of anything
14 Kellyanne Conway did that you can think of to
15 elevate women during the campaign?

16 A I -- AJ, I can't remember a specific
17 example. I mean, women were a big part of the
18 campaign.

19 Q Any specific -- specific examples of
20 Kellyanne?

21 A No, I don't remember. I don't remember.
22 If you gave me a specific example, I might remember
23 it. I just can't remember one.

24 Q Okay. Is it accurate to say that the
25 Mercers recommended that Kellyanne be made campaign

1 manager?

2 A It's not where it started.

3 Q Right. Not asking where --

4 A I don't -- I wasn't part of any meetings
5 with the Mercers where they might have recommended
6 it, so that's possible. I wasn't -- I wasn't
7 present.

8 Q So when you say "it's not when it
9 started," what -- what do you know about it?

10 A The -- the early ideas of having a female
11 campaign manager came from -- from me.

12 Q Okay. Could you tell me more about that?

13 A I just felt that, under the circumstances
14 of the campaign, it would be good to have a female
15 campaign manager and show the president was positive
16 towards females and that a female could lead it.
17 And I thought it would be -- I thought it would be
18 positive for the campaign messaging to have a female
19 campaign manager.

20 Q Okay.

21 A However, I don't know if I was first. I
22 know that I was one of the first people talking
23 about it openly.

24 Q Okay. To clarify -- well, let's come back
25 to that.

1 You stated earlier that you'd given
2 Jason Miller a job with the 2020 campaign because
3 you believe in, quote, redemption; is that correct?

4 **A That's not why I gave him a job. I didn't**
5 **have a problem with what occurred under the**
6 **circumstances. It's not the why, though.**

7 Q You said you did -- I'm sorry. To -- you
8 said just now that you didn't have a problem with
9 what had occurred?

10 **A Yeah. It was redemption. I mean, I -- I**
11 **don't know exactly -- I didn't have -- I felt like**
12 **people could -- could get better on things. I mean,**
13 **I think that there is always -- I think that's --**
14 **that's an opportunity that could happen, yes.**

15 I wasn't happy about it, but I also
16 thought that, you know, people deserve redemption.

17 Q Did you have any concern or trepidation in
18 terms of bringing Miller on but having denied me,
19 which we spoke about earlier, the opportunity to
20 come on?

21 MR. WOODWARD: Object to the form.

22 MS. DELGADO: Okay. I'll rephrase it.

23 BY MS. DELGADO:

24 Q Earlier, we spoke, the 2020 campaign,
25 being aware that I had inquired about a job and that

1 job offer not being extended, correct?

2 **A Yes.**

3 MR. WOODWARD: Object to the form.

4 BY MS. DELGADO:

5 Q And did you have any misgivings about then
6 bringing Jason Miller on?

7 MR. WOODWARD: Object to the form.

8 BY MS. DELGADO:

9 Q You can answer.

10 **A Yes. I mean, I had plenty of doubt. You**
11 **know, that was -- that was one of my -- that was a**
12 **tough hire under the circumstances. I had plenty of**
13 **misgivings about what I thought could happen in that**
14 **situation from punch -- from publicity to my own**
15 **relationship with the President. You know, I had a**
16 **lot of misgivings on that.**

17 I thought I didn't -- by the time I
18 hired him, I -- I really -- I felt like it was
19 something I had to do to -- to save where the
20 campaign was at the time.

21 Q Did you see a problem with or have any
22 concern about having denied the -- the woman in this
23 case, being myself, a job in summer 2019? And when
24 I say "you," I mean the campaign.

25 And then --

1 MR. WOODWARD: Object to -- object to the
2 form.

3 MS. DELGADO: Okay. I was halfway through
4 the question, so I'll just -- glad to take the
5 advice. Let me -- I'll rephrase it.

6 BY MS. DELGADO:

7 Q Is it correct that, in 2016, Jason Miller
8 impregnated me? Were you aware of that -- of the
9 reports on that?

10 MR. WOODWARD: Object to the form.

11 **A Yes, I was aware, obviously.**

12 BY MS. DELGADO:

13 Q Okay. And we've established -- correct me
14 if I'm wrong -- that, in summer 2019, I reached out
15 to the campaign for a position; is that correct?

16 MR. WOODWARD: Object to the form.

17 **A Yes.**

18 BY MS. DELGADO:

19 Q And we've established that, in summer
20 2020, the campaign hired Jason Miller; is that
21 correct?

22 MR. WOODWARD: Object to the form.

23 MS. DELGADO: Let me just rephrase them
24 both so we spare ourselves the trouble.
25

1 BY MS. DELGADO:

2 Q Is it correct that I reached out for a job
3 in the summer of 2019 with the campaign?

4 A I don't remember the year; but yes, you
5 did. I can't remember if it was '18 of '19, yes.

6 Q Okay.

7 A While I was campaign manager, yes.

8 Q Correct.

9 And I did not receive that job, did
10 I?

11 A Yeah -- no.

12 Q Okay. And in circa summer 2020, was Jason
13 Miller hired?

14 A It was definitely 2020. I don't -- what's
15 the first word you used?

16 Q Summer.

17 A Summer? I can't -- I think it was
18 post-COVID.

19 MR. WOODWARD: I think the word was circa.

20 THE WITNESS: Circa? Okay.

21 BY MS. DELGADO:

22 Q It just means, like, ballpark. Around --

23 A Yeah, I -- I couldn't understand what you
24 said. I apologize.

25 Q Okay. Around summer 2020.

1 **A Post-COVID. That's kind of what I**
2 **remember.**

3 Q I know you know what circa means. I
4 didn't mean to offend. I know you have --

5 **A Yeah. Yeah.**

6 Q -- an extensive vocabulary.

7 **A I just don't -- I just -- I don't remember**
8 **if it was summer or spring or what it was, but it**
9 **was post-COVID.**

10 Q Okay. In 2020; is that correct?

11 **A Yes, during COVID.**

12 Q So did you have any misgivings, or anyone
13 at the campaign, about denying AJ a job but bringing
14 on Miller?

15 MR. WOODWARD: Object to the form.

16 MR. BLUMETTI: Same objection.

17 **A I -- I don't think that came up, honestly.**
18 **But was there misgivings about hiring Jason and his**
19 **circumstances and -- and was it -- was it weighed in**
20 **the benefits and the -- and the negatives? Yes.**

21 BY MS. DELGADO:

22 Q Okay. And you spoke of redemption. In
23 your definition of redemption, does redemption first
24 require atoning for what one did?

25 MR. WOODWARD: Objection.

1 **A** I mean -- I had no idea at that point of
2 what the true story was. I had only -- I was
3 getting one side of the story.

4 BY MS. DELGADO:

5 **Q** Which -- whose side?

6 **A** I mean, the -- the side that people were
7 telling me. I -- I didn't have your side of it at
8 that point. I didn't know exactly what was going
9 on, and I felt at that time that, I guess -- I can't
10 remember exactly what I felt.

11 **Q** But you were aware that Jason Miller, in
12 2016, had impregnated a subordinate; were you not?

13 MR. WOODWARD: Objection.

14 **A** Yes.

15 BY MS. DELGADO:

16 **Q** Okay. I want to show you an exhibit.

17 **A** Okay.

18 **Q** Here I go trying to conquer Zoom. We're
19 going to test --

20 THE STENOGRAPHER: Continuing from the
21 last deposition, this will be Number 14.

22 MS. DELGADO: Thank you, Leila.

23 (Exhibit 14 was marked for
24 identification)

25

1 BY MS. DELGADO:

2 Q So I am going to do share screen. And --
3 and that other Delgado, same as last time, is -- is
4 me. That's just my exhibits.

5 Are you able to see the screen, Brad?

6 **A Yes.**

7 Q Okay. Can you tell -- can you read the
8 headline of that and tell me the date, please?

9 MR. WOODWARD: Object to the form.

10 **A Exclusive: Former Trump Aide Jason Miller**
11 **Admits to Hiring Prostitutes in 2015 and 2017.**
12 **July 16th, 2019.**

13 BY MS. DELGADO:

14 Q So did this article come out before you
15 hired Jason?

16 **A I can't recall -- I mean, it -- yes, it**
17 **came out before. You asked me if I remember or --**
18 **what'd -- what'd you ask me?**

19 Q No. Just did this article come out before
20 you hired Jason?

21 **A Yes.**

22 MR. WOODWARD: Object to the form.

23 BY MS. DELGADO:

24 Q Okay. Was this article published,
25 according to the headline, before you hired Jason?

1 MR. WOODWARD: Object to the form.

2 **A Yes.**

3 BY MS. DELGADO:

4 Q Okay. And -- let's see.

5 I'm scrolling down because I want to
6 show you...

7 In bold, there's a name there,
8 Catherine Frazier. Do you see that?

9 **A Yes.**

10 Q Okay. And it states that Mr. Miller had
11 had another affair with a woman named Catherine
12 Frazier while working for Senator Ted Cruz's
13 presidential campaign. Is that correct?

14 MR. WOODWARD: Object to the form.

15 BY MS. DELGADO:

16 Q Or you're -- you're free to read it
17 yourself.

18 **A Yeah. I mean, I -- I -- what -- what do**
19 **you want me to do? You want me to read it, or you**
20 **want me to -- I'm sorry. There was people --**

21 Q Sorry. Is it -- am I reading it correctly
22 that it says Mr. Miller had another affair -- it
23 uses the word affair -- with Catherine Frazier, who
24 worked with Mr. Miller on Senator Ted Cruz's
25 campaign when --

1 MR. WOODWARD: Object to the form.

2 BY MS. DELGADO:

3 Q -- when Mr. Miller was working on it?

4 MR. WOODWARD: Object to the form.

5 **A Yes, that's what it says.**

6 BY MS. DELGADO:

7 Q Okay. Earlier, you had stated that the
8 reason you weren't concerned about Mr. Miller
9 conducting himself in a concerning manner again is
10 because you didn't think somebody would do something
11 stupid twice.

12 Is that correct, or words to that
13 effect?

14 MR. WOODWARD: Object to the form.

15 **A I -- I -- I think I said it again, but I**
16 **can't remember -- I don't know if it's twice, three**
17 **times, or what. I fell under the circumstances at**
18 **that point, like, it would be dumb. Also, it was**
19 **COVID. We weren't even in the office at that time.**
20 **I -- I -- I -- no, I didn't think it would happen**
21 **again.**

22 BY MS. DELGADO:

23 Q Okay. But according to this, would you
24 agree that, assuming this is correct, that it had
25 already happened twice with Mr. Miller? Would

1 you --

2 MR. WOODWARD: Object to the form.

3 A I knew that now? Reading this, I was
4 unaware of this second affair until, actually, you
5 showed me this.

6 BY MS. DELGADO:

7 Q So you never saw this before hiring
8 Mr. Miller?

9 A I did not. First time I saw this was
10 after I left the election.

11 Q And no one at the -- do you know of anyone
12 at the campaign seeing this?

13 MR. WOODWARD: Object to the form.

14 A I couldn't state that -- that -- how would
15 I know what everybody in the campaign saw? I didn't
16 see it. This is actually the first time I've ever
17 read that paragraph that I remember.

18 BY MS. DELGADO:

19 Q But -- okay. Wouldn't you, as a
20 responsible campaign manager, Google someone before
21 bringing them back in?

22 MR. BLUMETTI: Objection to form.

23 MR. WOODWARD: Object to the form.

24 A Possibly. That doesn't mean it showed up
25 in my results. I mean, I didn't read everything.

1 And I would also ask staff to bring me stuff and ask
2 them opinions, and I would -- I wouldn't do
3 everything by myself. I -- you know, I was quite
4 busy during COVID and trying to keep a campaign
5 together that it just became illegal to come into
6 the office.

7 BY MS. DELGADO:

8 Q When you say you-all weren't in the
9 office, at what point were there actually members in
10 the office in Virginia?

11 A I can't remember the month, but it was not
12 soon -- soon before I was let go.

13 Q So Jason Miller, at some point, was with
14 staff members in an office; is that correct?

15 A Yes.

16 Q Okay.

17 MS. DELGADO: We can take this one down.

18 BY MS. DELGADO:

19 Q And do you know if Mr. Miller -- again,
20 speaking --

21 A Can I take -- AJ, can I take my glasses
22 off again?

23 Q Of course. Of course. You can even turn
24 the camera off if you'd like. It's not -- I'm fine
25 either way.

1 Do you know if Mr. Miller engaged in
2 any acts of atonement or expressed remorse for his
3 actions in 2016 on the campaign?

4 MR. WOODWARD: Object to the form.

5 **A Could you describe to me what -- how you**
6 **define atonement, please?**

7 BY MS. DELGADO:

8 Q That -- that's what I'm asking you to
9 define.

10 **A Can you -- can you repeat the question**
11 **again, now?**

12 Q Okay. I'll take -- I'll -- do you know if
13 Mr. Miller engaged in any acts to undo or -- and/or
14 make up for any harm his actions in 2016 caused?

15 MR. WOODWARD: Object to the form.

16 **A Am I aware if he did, or am I aware if**
17 **someone said he did?**

18 BY MS. DELGADO:

19 Q No. Everything in -- in this deposition,
20 everything is just if you're aware. I don't expect
21 you to know what's in anybody else's mind.

22 **A Okay. I -- but -- can I ask question in**
23 **turn because are you -- am I aware that he actually**
24 **did or people said he did?**

25 Q No.

1 Brad, you have said that part of the
2 reason you brought Mr. Miller back into the 2020
3 campaign was because you believe in atonement, I
4 believe.

5 **A Yes. Yes.**

6 Q Okay. You believe in redemption, was your
7 word. I don't want to mischaracterize. Redemption
8 was the word you used.

9 **A Yeah. I believe that people can be**
10 **forgiven for -- for mistakes.**

11 Q Right.

12 So as part of that, do you know if
13 Mr. Miller took any steps to deserve redemption such
14 as asking for forgiveness or taking any steps to
15 undo any harm he caused?

16 MR. WOODWARD: Object to --

17 BY MS. DELGADO:

18 Q Is that better?

19 MR. WOODWARD: Object to the form.

20 MR. BLUMETTI: Objection to form.

21 **A Yes. I am unaware if he did anything. I**
22 **am aware that people told me he did at that time.**

23 BY MS. DELGADO:

24 Q Okay. What did they tell you he did?

25 **A I -- I -- AJ, I can't remember.**

1 MR. WOODWARD: And object to the form.

2 A I can't remember what they said. People
3 were telling me at that point that --

4 Q So you -- you have no --

5 (Simultaneous speakers.)

6 BY MS. DELGADO:

7 Q Uh-huh. Sorry. Go ahead. Go ahead.

8 A I just -- I didn't have -- I didn't have
9 actual evidence at the time, no.

10 Q So you had no actual basis to believe
11 Mr. Miller was deserving of redemption, did you?

12 MR. WOODWARD: Object to the form.

13 A I'm -- I'm not his judge and jury.

14 The -- the -- at that time, I felt
15 that the risk was -- was there. I felt at that time
16 that his public risk was a considerable risk.
17 However, people were in my ear and other people were
18 telling me that it was a calculated risk worth of
19 the hiring.

20 BY MS. DELGADO:

21 Q Do you at least remember who they were, if
22 not what was said?

23 MR. WOODWARD: Object to the form.

24 BY MS. DELGADO:

25 Q Okay. Do you remember -- when you say

1 people were in your ear, who? Who were those
2 people?

3 A I can't recall exactly everyone that told
4 me, but the -- there were multiple meetings we had.
5 You know, at this point, these meetings are all
6 mostly by phone. You know, we can't see each other
7 in person.

8 Q Uh-huh.

9 A We would have calls, and it was clear that
10 the President was needing to talk to somebody that
11 he felt was more of a knife fighter politically in a
12 conversation style with the press as he felt the
13 press was losing, and I was getting multiple
14 suggestions to hire Jason. I was very reluctant to
15 do it at the beginning. This was a difficult
16 decision for me.

17 I -- I literally remember asking, you
18 know -- I mean, how -- I don't even know how many
19 people, do you think it's -- should I do it, should
20 I not. And I probably got several noes and several
21 yeses, and then I made the decision to eventually
22 hire him with a calculated risk.

23 Q Was one of those individuals in your ear
24 Jared?

25 A I -- I -- I don't recall exactly if it

1 was, but I'm sure that Jared was someone who I asked
2 the question. But I couldn't tell you if he was a
3 yes or a no.

4 Q I ask because Mr. Miller has -- has stated
5 that it was Jared who asked him to come back in.

6 Would --

7 MR. WOODWARD: Object to the form.

8 BY MS. DELGADO:

9 Q -- that be correct?

10 A Completely possible that Jared had a
11 separate phone call from me. I just don't remember.
12 It sounds like it could be completely plausible.

13 But I'm under oath here, and I don't
14 remember the exact conversation.

15 Q So to be clear, at the end of the day, the
16 impregnated -- would it be correct to say, do you
17 agree with the fact that the impregnated staffer was
18 not brought back and the staffer who did the
19 impregnating was?

20 MR. WOODWARD: Object to the form.

21 MS. DELGADO: It's factually accurate.

22 A That is not --

23 BY MS. DELGADO:

24 Q It's just a fact. Just a factual
25 question.

1 **A The fact is, yes. Not the reason why that**
2 **was done; but yes, that is a fact.**

3 Q We talked about Hannah Castillo having a
4 baby during the campaign. Do you know of any other
5 women who were pregnant during the 2020 campaign?

6 **A I believe, at some point, it had several;**
7 **but I couldn't name them off. I believe, at one**
8 **point, I kind of remember a photo op where we had**
9 **several pregnant women.**

10 Q Okay. What about in 2016?

11 **A The only one I remember is you.**

12 Q You testified earlier that a concern in
13 bringing me -- well, let me not -- I'm not trying to
14 mischaracterize your testimony.

15 You referenced earlier a litigation
16 that I have filed. What litigation were you
17 referring to?

18 **A I don't know -- I don't even know how to**
19 **answer that. Like, what -- I don't -- what**
20 **litigation?**

21 Q When we spoke about my out -- I'm sorry.
22 I should have been clearer.

23 When we spoke about my outreach for a
24 job --

25 **A Yes.**

1 Q -- in which you say is either 2018 or
2 2019, but --

3 A Yes.

4 Q -- either way, my outreach about a job in
5 the 2020 campaign team, you referenced a concern
6 about litigation. Which litigation is that?

7 A All I remember was you had sued the 2016
8 campaign is what I had been told.

9 Q Did you ever see a court filing?

10 A I don't recall.

11 Q Is it possible -- was -- that I had said I
12 considered suing the 2016 campaign? Is that --

13 MR. WOODWARD: Object to the form.

14 A I guess it's plausible.

15 BY MS. DELGADO:

16 Q So is it possible you're referencing
17 threatened litigation but not actual litigation?

18 MR. WOODWARD: Object to the form.

19 A It's plausible, I guess.

20 I was told you sued the 2016
21 campaign. So...

22 BY MS. DELGADO:

23 Q Who told you that?

24 A I -- I -- you asked me, I think this last
25 time. I don't remember. I'm --

1 (Simultaneous speakers.)

2 BY MS. DELGADO:

3 Q So that your understanding was that I was
4 seeking a job while suing the campaign?

5 A No. That you had previously sued the 2016
6 campaign.

7 Q That I had --

8 (Simultaneous speakers.)

9 A I'll walk you through my timeline if you
10 want.

11 '16, I thought you sued the campaign.
12 You got the job at the -- at the Super PAC. I
13 thought that -- it ended everything. I go into --
14 into the '20 race. I'm under the impression that I
15 have been told over the years that you had sued the
16 2016 campaign, ended it, and that you had threatened
17 to resue it after leaving the PAC.

18 And that is when I made the decision
19 that this was too risky to take the campaign because
20 all the litigation and the lawyers and other people
21 were pressing me that this was -- was -- was
22 litigious, I think they used the word, or something
23 like that, like -- that this is too much risk.

24 I obviously always thought you were
25 qualified, and -- and -- but under those

1 **circumstances, I didn't think that the juice was**
2 **worth the squeeze at that moment.**

3 BY MS. DELGADO:

4 Q Okay. Let's talk a bit about -- this
5 one's going to be more exhibits.

6 MS. DELGADO: Am I still sharing?
7 Hopefully not?

8 THE WITNESS: No.

9 MS. DELGADO: Okay. Thank you.

10 THE STENOGRAPHER: No, you took that one
11 down. This will be 15.

12 MS. DELGADO: Okay. You just --

13 THE WITNESS: Can I -- can I take a piss
14 break or not?

15 MS. DELGADO: Yes, of course. Go ahead.
16 Everybody want five minutes?

17 THE WITNESS: I've been drinking this
18 bottle of water.

19 THE STENOGRAPHER: All right. Off the
20 record.

21 *(Recess.)*

22 BY MS. DELGADO:

23 Q Brad, last time, you mentioned a Garrett
24 Lansing as an example of somebody who -- while not
25 at the campaign, was at the war room. Do you

1 remember, I had asked you about who from the
2 campaign didn't receive jobs in the White House?

3 **A Uh-huh.**

4 Q Do you remember mentioning --

5 **A Yes. Sorry. I did uh-huh. Yes.**

6 MS. DELGADO: Sorry. Was there an
7 objection?

8 **A No. I said uh-huh, and then I objected to**
9 **my own answer and I said yes.**

10 BY MS. DELGADO:

11 Q Okay. Do you recall the name Garrett
12 Lansing that --

13 **A Yes, ma'am.**

14 Q Okay. And you had qualified that to your
15 credit, that Mr. Lansing wasn't with the campaign;
16 rather, with the RNC, correct?

17 **A Yes. I believe you asked me who was in**
18 **the war room and -- and on the floor.**

19 Q Correct. I had asked you about the war
20 room, and you rightly so included individuals who
21 were also from the RNC given that they were also
22 seated in the war room. And then we talked about
23 just campaign goals.

24 But you had mentioned Garrett Lansing
25 as someone who did not receive a White House job,

1 correct?

2 **A I -- I believe so.**

3 Q Okay. Let's see.

4 MS. DELGADO: Okay. Throwing up another
5 exhibit.

6 (Exhibit 15 was marked for
7 identification)

8 BY MS. DELGADO:

9 Q Okay. Is that Mr. Lansing? Is that the
10 same Garrett we're talking about?

11 **A Yep.**

12 Q Okay. Do you agree with the report's
13 premise; is that correct, that he received quite a
14 bit from the 2016 campaign --

15 **A Yeah.**

16 Q It's -- let me not say it quite a bit. It
17 was already...

18 It -- this article concerns
19 Mr. Lansing's payout from the 2016 campaign. Is
20 that of a million dollars nearly? Is that generally
21 your understanding?

22 MR. WOODWARD: Object to the form.

23 **A I could not say how much he actually made.**

24 **As many articles made false**
25 **accusations of my own payout, I -- I would hate to**

1 **make assumptions of other people's.**

2 BY MS. DELGADO:

3 Q Okay. That's fair.

4 So I'm going to put up another.

5 (Exhibit 16 was marked for
6 identification)

7 BY MS. DELGADO:

8 Q Okay. This is an article from Politico.

9 **A Okay.**

10 Q It's -- it's late February 2017. I'm just
11 going to read the top section.

12 White House Chief Digital Officer
13 Garrett Lansing.

14 Is that accurate?

15 MR. WOODWARD: Object to the form.

16 **A I -- I didn't really understand what --**
17 **what was the question? Like, is this -- is this**
18 **about Garrett? Sorry.**

19 BY MS. DELGADO:

20 Q I'm asking, does the article refer to
21 Garrett Lansing as the White House Chief Digital
22 Officer?

23 MR. WOODWARD: Object to the form.

24 **A Yes, ma'am.**

25

1 BY MS. DELGADO:

2 Q Does that refresh your recollection as to
3 whether your -- as to whether Mr. Lansing did
4 receive a job?

5 A I guess it changes my opinion on what -- I
6 didn't know he got a job and then lost it. I didn't
7 know that. I just knew he didn't have a job.

8 So I don't know if I ever read this.
9 I just know he didn't get it.

10 Q So -- so you're effectively now taking the
11 position that he probably did receive a job, but
12 then later lost the job; is that accurate?

13 MR. WOODWARD: Object to the form.

14 A Honestly, I don't know exactly how White
15 House jobs work that way. I was never part of the
16 process, so that could be accurate, yes. But I also
17 don't trust the media at all. So possibly, yes.

18 BY MS. DELGADO:

19 Q Do you agree with me that there is a
20 report dated February 22nd, 2017 referring to
21 Garrett Lansing as the White House Chief Digital
22 Officer?

23 MR. WOODWARD: Object to the form.

24 A Could -- would you -- who -- what outlet
25 is this, just so I know? Like it -- I just want to

1 **make sure --**

2 BY MS. DELGADO:

3 Q I'm happy to send you the -- you can
4 Google it yourself. I'm more than happy to let you.

5 I believe it's --

6 A I'm just asking if it's somebody -- if
7 it's somebody big, I -- then, yes. If it's -- you
8 know, this is like a blog post, you know, I don't
9 know. That's all I was asking.

10 But that sounds right, yeah. It
11 looks like that's what happened, then. I -- I will
12 agree with that in your opinion, if that's --

13 (Simultaneous speakers.)

14 BY MS. DELGADO:

15 Q Here, let me take tell you exactly.

16 A AJ, I don't trust all the medias, you
17 know, so...

18 Q Of course.

19 Brad, it is from Politico.

20 A That's fine. Then that sounds -- yes.

21 Q Okay. So would you agree with me that he
22 did receive a White House job?

23 MR. WOODWARD: Object to the form.

24 A I don't know if he ever went there, but it
25 sounds like he got the -- he got the job and failed

1 the background test.

2 Q Okay.

3 A I don't know the exact process. I don't
4 know if he showed up for a day at work then had to
5 leave. I don't know how that works.

6 Q Okay. And the other person you mentioned
7 was also not a campaign staffer.

8 A I think I -- I said David Bossie, Garrett
9 Lansing -- David Bossie was another one I think I
10 mentioned. Trying to think who else I mentioned
11 that day.

12 I was like -- in my head, I was
13 walking office from office around in a circle, you
14 know?

15 Q Uh-huh. Take your time.

16 A You know, I mean, there's other people who
17 probably didn't take them, you know. Matt
18 Oczkowski, the -- the day -- one of the data guys.

19 I don't know who -- here's -- here's
20 the issue. I don't know who asked for jobs, who
21 didn't get jobs. You just asked me who didn't get
22 jobs in the White House in the war room, and I just
23 tried to remember people.

24 Q Sure, sure.

25 You had mentioned a Sarah from

1 Cambridge Analytica?

2 **A Yeah. So Sarah and Matt would have both**
3 **been there. I can't remember who Sarah is. I -- I**
4 **don't know if she asked for a job. I don't know if**
5 **Matt asked for a job. Those are just people that,**
6 **that day, I was, like, remembering faces that were**
7 **in the war room.**

8 Q Okay. And when you say "Matt," that's the
9 gentleman that they referred to as, quote/unquote,
10 Oz?

11 **A Yeah, because no one could say his last**
12 **name.**

13 Q Okay. And -- and both Oz -- Oz. Both Oz
14 and Sarah were with Cambridge Analytica, correct?

15 MR. WOODWARD: Object to the form.

16 **A I believe -- I know Matt was for sure. I**
17 **believe Sarah was employed by, also. There was --**

18 **(Simultaneous speakers.)**

19 BY MS. DELGADO:

20 Q I'll just rephrase it to avoid any issues.

21 Were Matt and Sarah employees of
22 Cambridge Analytica?

23 MR. WOODWARD: Object to the form.

24 **A I believe so.**

25

1 BY MS. DELGADO:

2 Q Okay. So they were not --

3 (Simultaneous speakers.)

4 A Oz was for -- Oz was sure. I could not
5 tell you who -- who employed Sarah.

6 BY MS. DELGADO:

7 Q Okay.

8 A I can't even remember if her name was
9 really Sarah, which makes me feel really bad right
10 now since she was in my office. But I -- like,
11 90 percent her name was Sarah, and I -- and I don't
12 remember exactly who paid her. It's been a while.

13 Q So they -- so were either Oz or Sarah,
14 quote/unquote, staff members or independent
15 contractors directly to the campaign?

16 MR. WOODWARD: Object to the form.

17 A They were independent contractors, I --
18 both.

19 BY MS. DELGADO:

20 Q Contracted by you?

21 A No, the campaign.

22 Q Okay. So would they be listed on FEC
23 disclosures?

24 A Yeah. Trust me, Cambridge Analytica is
25 written all over that. I've had to live with that

1 **for ten years.**

2 Q No, I know Cambridge is. But were they
3 not employed or contracted to Cambridge, not to the
4 campaign?

5 A Well, if you make that argument, then I
6 wasn't employed by the campaign either.

7 Q But you had a campaign title, correct?

8 A They had campaign titles.

9 Q What were their titles?

10 A I think Matt was head of digital --
11 data -- head of data.

12 Q Okay.

13 A Data -- he was data director. That's what
14 I believe it was.

15 Q Were they in New York?

16 A Yes. They were back and forth from San
17 Antonio to New York. Well, all of us did in data
18 digital. We would spend brief -- you know, few days
19 in New York, and then a few days in San Antonio.
20 Went back and forth.

21 There's another one. Now, Gary Coby,
22 he didn't go either, the White House. I just don't
23 remember people -- lots of people in data and
24 digital department did not go to the White House.

25 I actually don't think anyone did,

1 that I think about it.

2 Q At --

3 (Simultaneous speakers.)

4 BY MS. DELGADO:

5 Q Sorry?

6 A I don't think -- I'm trying to think if --

7 I don't think anyone from the data digital

8 department went to the White House. I think --

9 (Simultaneous speakers.)

10 A The clinical data department did; but the

11 data and digital, no one went.

12 BY MS. DELGADO:

13 Q Do you know if they sought employment?

14 A I couldn't tell you, AJ. Maybe not.

15 I can tell you only me. I didn't.

16 Q Did you recommend others?

17 A I gave a lot of recommendations back then.

18 I couldn't recall all I gave. I just can't

19 remember.

20 Q Like, how many people would you say you
21 recommended for an administration role? Like, five,
22 ten?

23 A About five to ten maybe? You know? I
24 also talked a bunch out of it.

25 Q Okay. Fair enough.

1 Okay. Do you know if, when it
2 emerged that I was pregnant, anyone from the
3 campaign reached out to me from the 2016 campaign?

4 MR. WOODWARD: Object to the form.

5 **A AJ, I can't remember how I found out about**
6 **it, the whole situation.**

7 BY MS. DELGADO:

8 Q Sure. Let me be clear.

9 **A I -- I mean, I -- I just don't remember.**

10 Q Okay. Do -- sorry. My question was
11 unclear. I'm happy to rephrase it.

12 Do you know -- and if you don't,
13 that's okay -- whether, when it emerged that I was
14 pregnant -- say from the point you found out -- do
15 you know if anyone from the campaign reached out to
16 me? Did you hear of any such thing?

17 **A Reach out to you or reach out to me?**

18 Q To me, the pregnant one.

19 MR. WOODWARD: Object to the form.

20 **A I -- I don't recall that. I have no**
21 **memory of that.**

22 BY MS. DELGADO:

23 Q Okay. You stated earlier that Hannah
24 Castillo left the campaign at -- shortly after you
25 did.

1 **A Yes, ma'am.**

2 Q Are you able to --

3 (Simultaneous speakers.)

4 **A I don't know if it was shortly after, but**
5 **it was after.**

6 BY MS. DELGADO:

7 Q Okay. Between the time you left and the
8 election; is that correct?

9 **A Yes, ma'am, I did hear that.**

10 Q And would you agree it's uncommon for an
11 employee to leave shortly prior to the election?

12 MR. WOODWARD: Object to the form.

13 **A I -- uncommon?**

14 BY MS. DELGADO:

15 Q Let me rephrase.

16 **A Yes.**

17 Q Hold on, Brad. Let me just rephrase it
18 before you answer.

19 In your opinion, is it uncommon
20 for --

21 MR. WOODWARD: Objection --

22 BY MS. DELGADO:

23 Q -- an employee on a campaign to exit
24 shortly before the election?

25 MR. WOODWARD: Object to the form.

1 You can answer.

2 **A I believe so. I thought it was also**
3 **uncommon for me to get fired, so...**

4 BY MS. DELGADO:

5 Q Agree.

6 **A Well, I was demoted officially somehow,**
7 **whatever that means.**

8 Q That's true. That's true. You were not
9 fired.

10 **A I'm under oath, so I want to say it**
11 **correctly.**

12 Q Agree.

13 Okay. Oh, and I know you said last
14 time that you've never met Mr. Blumetti, campaign
15 counsel; but have you ever spoken to him?

16 **A Who's that?**

17 Q Mr. -- the Trump campaign counsel, also on
18 the line. Jared Blumetti.

19 **A Oh. I've only see him twice, and that's**
20 **on this Zoom.**

21 Q Have you ever spoken to him?

22 **A I don't -- I don't believe so. No.**

23 Q Okay.

24 **A I mean, I might have been a conference**
25 **call over the last ten years -- I don't know how**

1 long he's worked for the Trump campaign, I mean.

2 But I don't -- I've never had a direct conversation
3 with him that I remember.

4 Q Okay.

5 A I didn't even know who you were talking
6 about when you said his name.

7 THE WITNESS: Sorry, Jared.

8 MR. BLUMETTI: Quite all right.

9 BY MS. DELGADO:

10 Q He'll be okay.

11 Do you know who Kellyanne recommended
12 for White House roles or -- or administration roles,
13 women -- female?

14 A Kellyanne does not confer with me before
15 her decisions.

16 Q Okay. And I -- I don't -- let's see. I'm
17 trying to -- this is a sensitive question, so I'm
18 trying to ask it respectfully.

19 Were you -- did you experience any
20 incident of sexual advance made on you by anyone in
21 the 2020 campaign?

22 A The 2020 campaign?

23 Q Or the 2016 campaign?

24 A Nothing of any substance, no. I don't
25 believe so.

1 Q Okay.

2 A I don't recall anybody.

3 Q Do you recall a conversation we had about
4 a staffer -- I think it was Jessica Ditto or Ashley
5 Merkarski -- who had -- and I'm sorry to bring this
6 up -- who had grabbed your private parts while you
7 were speaking?

8 MR. WOODWARD: Object to the form.

9 A Who was the other name?

10 BY MS. DELGADO:

11 Q Jessica Ditto or Ashley Merkarski. I
12 might be fumbling her last name.

13 A I -- I -- I don't have any direct recall
14 of, like, who or what. I do kind of remember having
15 a conversation with -- there were moments where
16 people were overly flirtatious, but I would not take
17 anything as me being sexually harassed.

18 But I -- I can't remember who it was
19 now, AJ. Like, yeah, there was -- it's a campaign.

20 But I don't remember who. I don't
21 think it was either of those names, but I could -- I
22 don't remember.

23 Q And just to be clear, there is no
24 implication whatsoever that you did anything wrong
25 in this line of questioning, quite the opposite.

1 But -- and -- and I'm not even asking if you felt
2 that it was, quote/unquote, sexual harassment.

3 What -- my question was, was any
4 sexual advance --

5 (Simultaneous speakers.)

6 A I -- I don't --

7 MR. WOODWARD: Object -- object to the
8 form.

9 A You know, I'm here under oath. I want to
10 make sure I say -- I don't remem- -- I don't
11 remember who or what. I -- there were definitely
12 times in between when I was campaign manager,
13 advances were made or small innuendos were made; but
14 in that role of power, it's not whether or not that
15 will happen. It's how you deal with it and making
16 sure that you -- you don't do anything with it and
17 you properly engage with it afterwards in a way that
18 is respectful and -- and you move on in a -- in a
19 way that -- to establish boundaries.

20 And if any of those cases would have
21 happened, I -- I would believe that I would handle
22 it in that manner.

23 BY MS. DELGADO:

24 Q Sure.

25 And to be clear, everything I know of

1 you is you're a very respectful man, respectful to
2 your marriage, and faithful in your marriage. So
3 again, this is not done to imply in any way that you
4 welcomed such behavior.

5 Do you recall other -- you stated
6 regarding the -- regarding the -- the penis touching
7 or grabbing attempt. You stated you don't recall
8 exactly who it was?

9 MR. WOODWARD: Object to the form.

10 A No. No, I don't. I don't know if it
11 was --

12 (Simultaneous speakers.)

13 BY MS. DELGADO:

14 Q Let me rephrase --

15 A And I don't know if it -- and I don't know
16 if it is explicit as you're saying it right now,
17 but -- look, there was -- I've -- for my entire
18 25-year career, you know, there's been moments where
19 I've had things like that occur and I've had to --
20 to deal with that and always treat my -- my business
21 relationships as business relationships and to
22 establish immediate boundaries and move on.

23 I have always tried to not make a big
24 deal about those, and I've always tried to process
25 those ways also not to be disrespectful to the

1 person doing that.

2 I don't remember that exact incident.
3 I remember incidents like that. I couldn't even
4 tell you who their faces were now. If anything,
5 they were -- they were -- I don't -- I can't
6 remember names and -- none of it was so was dramatic
7 that it made it an incident in my life.

8 Q Do you remember Jessica Ditto making any
9 sort of --

10 A No, I don't believe it was Jessica Ditto.
11 I barely had any conversations with Jessica Ditto.
12 Only thing I remember about Jessica Ditto is Bannon.

13 Q Is what?

14 A Only thing I remember about Jessica Ditto
15 is Bannon. That's the only thing -- you know.
16 Isn't that the -- isn't that the -- is that --

17 Q Is Bannon?

18 A Oh, wait, no. That's not Bannon. That's
19 the other one.

20 No, I don't -- I -- I -- that --
21 sorry, I'm messing up people. It's been a long
22 time.

23 No. I mean, I -- I don't remember if
24 that -- that incident was with -- with her or not.
25 I don't believe so. I -- I think -- I don't think

1 she would have done that.

2 I -- the -- I can't remember who it
3 was. I don't think it was her.

4 Q What about Ashley?

5 A No. I don't think it would've been her
6 either.

7 Q Okay.

8 A They might have been around. I don't
9 remember who. I do remember a couple of those
10 incidents, though; and I remember conversations with
11 you talking about them. But I can't remember now
12 who it was. Honestly, it's almost been eight --
13 it's been ten years. Those would have been from
14 2016.

15 Q Any on 2019, including any work trips?

16 A No, not that -- no.

17 Q Okay.

18 A I would say, towards '19, '20, I -- I -- I
19 wasn't in places where that would have been, you
20 know, as readily -- you know, I was a much lower
21 person and hung out with the staff in 2016.

22 Q Right.

23 And you also had mentioned, because
24 of COVID, I presume --

25 A And COVID, I was stuck at -- you know, I

1 **was stuck in my house in my...**

2 Q Fair. Okay. Okay. And I'm sorry that
3 happened to you, by the way.

4 **A It's okay. I got over it.**

5 Q Okay. Okay.

6 Let's see.

7 You testified that Jason Miller had
8 been paid through Jamestown because he didn't want
9 his salary to be public. Do you recall why that
10 was?

11 MR. WOODWARD: Object to the form.

12 **A Ask that question exactly how you asked it**
13 **again. I want to make sure I answer as perfectly**
14 **honest as I can what you asked.**

15 BY MS. DELGADO:

16 Q Did you testify earlier that Jason Miller
17 wanted to be paid his 2020 campaign compensation
18 through Jamestown?

19 **A Yes.**

20 Q Okay. If so, do you recall why he wanted
21 to be paid through Jamestown?

22 **A I cannot remember if I was told why. I**
23 **could tell why I -- why I believed why.**

24 Q Please tell me.

25 **A Why I believe why is he didn't want it on**

1 the FEC report.

2 Q Do you know why he didn't want to be on
3 the FEC report?

4 MR. WOODWARD: Object to the form.

5 A I -- I could only assume why. I don't
6 remember if I -- under oath, I cannot remember if I
7 was told why. I can only tell what I -- what my
8 brain is telling me what I thought it was.

9 Q Okay. Please do.

10 A I just think he didn't want it on the FEC
11 report because he was going through things and
12 didn't want the world and public to know how much he
13 was getting paid.

14 Q What things?

15 A Well --

16 MR. WOODWARD: I'm going to object at this
17 point to relevance to this litigation.

18 MS. DELGADO: He was a campaign employee.

19 I disagree.

20 BY MS. DELGADO:

21 Q Go ahead, Brad. You can answer.

22 MR. WOODWARD: I'm going to instruct
23 Mr. Parscale not to answer insofar as this is a
24 topic that is not relevant to the claims and
25 defenses in this action.

1 MS. DELGADO: That's not a basis to
2 instruct your client not to answer. We've been
3 over --

4 MR. WOODWARD: Actually, pursuant to the
5 Court's April 24th, '24 order, Paragraph 2 on
6 Page 3, quote, Questioning must be limited to
7 topics that are relevant to the claims and
8 defenses in this action.

9 MS. DELGADO: Right. And it is relevant.

10 MR. WOODWARD: I maintain our objection --

11 MS. DELGADO: He's already opened the
12 door -- he's already opened the door.

13 MR. WOODWARD: I maintain our objection
14 and will instruct the witness not to answer.

15 THE WITNESS: I don't think -- okay.

16 MS. DELGADO: All this does it make -- is
17 make it so you make it obvious that the
18 campaign is protecting Jason Miller, and now
19 even third-party witness' attorneys. That's
20 not helpful to the campaign.

21 MR. BLUMETTI: Objection to form.

22 MS. DELGADO: So, Mr. Woodward, to be
23 clear, you're saying that actions the campaign
24 in 2020 took that may have resulted in harm to
25 me are not relevant to this campaign, correct?

1 MR. WOODWARD: I'm not testifying,
2 Ms. Delgado.

3 MS. DELGADO: No. You're -- but you're
4 making an objection on relevance. So I'm
5 trying to --

6 (Simultaneous speakers.)

7 MS. DELGADO: -- understand why you --
8 what your position is that a question about
9 harm that the campaign might have caused by
10 hiding Mr. Miller's salary is not relevant.

11 MR. WOODWARD: I'm happy to discuss this
12 with you off the record.

13 MS. DELGADO: Sure. Okay. We can do
14 that. Okay. We'll circle back to that at the
15 end to not waste time.

16 BY MS. DELGADO:

17 Q Okay. Are you neutral in this case, Brad?

18 MR. WOODWARD: Objection. You asked him
19 that in his prior deposition. The Court's
20 April 24th, 2024 order also instructs you not
21 to ask redundant questions previously posed to
22 Mr. Parscale.

23 I will instruct the witness --

24 MS. DELGADO: I'm well-aware of the order.
25 Can you point me to -- I'm happy to stand

1 corrected. Can you point me to where I asked
2 this already? I'm not looking to repeat. I
3 have the transcript you sent me.

4 MR. WOODWARD: We'll stand by our
5 objection.

6 MS. DELGADO: Can you point me to the page
7 number?

8 MR. WOODWARD: No.

9 MS. DELGADO: I'm -- I'm opening it now.
10 I didn't ask this already, Mr. Woodward.
11 Are you going to allow your client to
12 answer, then, since --

13 MR. WOODWARD: No, ma'am.

14 MS. DELGADO: Hmm?

15 MR. WOODWARD: No. I'm instructing the
16 witness not to answer.

17 MS. DELGADO: Okay. Do you want to
18 conclude and go to the -- see if the Judge is
19 available? Because, at this point, this is
20 just bad faith.

21 I'm asking you to please point me -- we
22 both have the transcript. Where did I ask it?
23 And if I did, I'm happy not -- to withdraw the
24 question.

25 MR. WOODWARD: And I'm not --

1 MS. DELGADO: That's perfectly reasonable.

2 MR. WOODWARD: And I'm not testifying, but
3 I'm happy to go off the record and discuss it
4 with you.

5 MS. DELGADO: You want to go off the
6 record to discuss how I already asked him a
7 question?

8 MR. WOODWARD: Yes, ma'am.

9 MS. DELGADO: We can always go back on the
10 record. Okay.

11 We'll go off the record for a minute,
12 Court Reporter.

13 THE STENOGRAPHER: Off the record.

14 (Recess.)

15 THE STENOGRAPHER: Back on the record.

16 MS. DELGADO: All right. We're back on
17 the record.

18 Mr. Woodward is taking the position that
19 this has already been asked given Page 49 of
20 the transcript in which, in Part 1 of his
21 deposition, I asked, quote, Brad, is there any
22 personal animus towards me regarding any issue
23 that would prevent you from giving honest
24 answers here today? Unquote.

25 Mr. Woodward's position is that that's

1 essentially the same thing as asking if
2 Mr. Parscale is neutral. And he's directed his
3 client not to answer.

4 BY MS. DELGADO:

5 Q Brad, are you hoping the campaign wins
6 this case?

7 MR. WOODWARD: Objection to relevance.

8 MS. DELGADO: It goes to credibility of
9 the witness.

10 MR. WOODWARD: No, it doesn't.

11 MS. DELGADO: Yes, it does.

12 BY MS. DELGADO:

13 Q You can answer.

14 MR. WOODWARD: No. I'm instructing him
15 not to answer.

16 MS. DELGADO: Okay. You -- you are out of
17 control, sir. This -- I've done multiple
18 depositions in this case. Nothing has been
19 like your conduct. You're not allowed to
20 instruct the witness not to answer.

21 Now, it's not based on already asked.
22 Now, the objection is what?

23 MR. WOODWARD: Pursuant to the Court's
24 April 24th, 2024 order, Questioning must be
25 limited to topics that are relevant to the

1 claims and defenses in this action.

2 MS. DELGADO: Sure. Versus going outside
3 of that.

4 The witness' credibility is not an issue
5 in this action?

6 MR. WOODWARD: We stand by our objection,
7 Ms. Delgado.

8 BY MS. DELGADO:

9 Q Brad, are you aware that your attorney --
10 not Mr. Woodward -- your other attorney is seeking
11 to represent the campaign in this case?

12 MR. WOODWARD: Objection to relevance.

13 MS. DELGADO: So again, he's not
14 permitted -- you're blocking your client from
15 answering?

16 MR. WOODWARD: He can answer.

17 **A Can I -- there's a lot that's been said.**
18 **Can you ask again what you asked me?**

19 MS. DELGADO: I want to get the case law
20 on the record. The credibility of a witness,
21 whether or not a party, is always relevant.
22 That's a direct quote from Shih vs. Petal Card.
23 It's a Southern District of New York case,
24 November 2021. It can be found at 2021 US
25 District Lexis 221324.

1 So, Mr. Woodward, you're really going to
2 take the position that Mr. Parscale cannot
3 answer on issues that affect his credibility
4 and speaks to his credibility even though
5 there's Southern District of New York case law
6 that specifically says that a party's
7 credibility is always relevant?

8 THE WITNESS: Didn't you just say I could
9 answer?

10 MS. DELGADO: Sorry?

11 MR. WOODWARD: I did -- I did just --

12 THE WITNESS: He just said I could answer.

13 BY MS. DELGADO:

14 Q Oh, I'm -- I'm referring to the other two
15 that he's also instructed you not to answer.

16 **A Oh. I'm sorry. Okay.**

17 Q But go ahead. We can -- go ahead and
18 answer this one.

19 **A I don't -- I --**

20 MR. WOODWARD: Can you repeat the
21 question?

22 **A Honestly, I can't remember which question**
23 **it was not. There's a lot going on here.**

24 BY MS. DELGADO:

25 Q Oh, I agree.

1 The question was: Are you aware that
2 your other attorney, Mr. Gavenman, is seeking to
3 represent the campaign in this case?

4 MR. WOODWARD: Object to the form.

5 **A I just found that out this morning that**
6 **that might -- that might be changing.**

7 BY MS. DELGADO:

8 Q So you found it out this morning?

9 **A I found out this morning it was him, yeah,**
10 **yeah, yeah. He -- I literally -- this is only the**
11 **second time I've ever met him, so he just said that**
12 **he might be representing the case this morning. And**
13 **I just asked what that meant.**

14 Q And you're okay with that?

15 **A Yeah --**

16 MR. WOODWARD: Sorry. Object to the form.

17 **A I mean, yes. He's not my -- it doesn't**
18 **bother me if he left or was with me or anything.**
19 **They're not advising me on what to answer any**
20 **questions, so I -- I'm -- I'm answering everything**
21 **truthfully.**

22 BY MS. DELGADO:

23 Q But you've shared information with them
24 that you haven't with me, correct?

25 **A I -- I don't think that's correct. I**

1 don't know. I mean, I don't think so. I've
2 answered every one of your questions. I've --
3 I've -- I'm honest, so...

4 Q Well, your attorney has claimed
5 attorney-client privilege multiple times.

6 You're not waiving that privilege,
7 are you?

8 A Well, I don't know what you mean by all
9 that, so. I'm not an attorney, so...

10 Q Your attorney --

11 MR. WOODWARD: Object to the form.

12 BY MS. DELGADO:

13 Q -- explained there is -- there is
14 information or documentation that is between you two
15 that I am not able to be privy to.

16 MR. WOODWARD: Object to the form.

17 A I mean, I -- you're asking me -- I talk to
18 my attorney, yes. I don't know what that -- I don't
19 know -- I don't know the laws of privilege. I'm not
20 an attorney. I stayed at a Holiday Inn Express
21 once.

22 BY MS. DELGADO:

23 Q So I understand you don't -- you're not an
24 attorney and you're stating you don't understand
25 attorney-client privilege.

1 A I understand attorney-client privilege.
2 I'm saying that I don't -- I don't have secrets out
3 there. I don't know what that means. You asked if
4 I have secrets. I don't have secrets. I don't
5 know. There's no secrets or -- you're asking me the
6 question. I'm answering what you did. I have no
7 reason to not answer your questions, so I don't know
8 what we're talking about now.

9 Q So any question from the prior deposition
10 on which your attorney claims attorney-client
11 privilege on your behalf?

12 A I don't remember what those are. I
13 haven't read the transcript. I don't -- I don't
14 know.

15 No. If -- if he says they are -- I
16 don't -- he's my attorney.

17 Q Are your interests in this case aligned
18 with the campaign's?

19 MR. WOODWARD: Object to the form. Object
20 to attorney-client privilege.

21 Don't answer.

22 MS. DELGADO: You're claiming that's
23 attorney-client privileged?

24 MR. WOODWARD: Yes.

25 MS. DELGADO: Whether he believes his

1 interest are aligned with the campaign's
2 interests?

3 MR. WOODWARD: Yes.

4 MS. DELGADO: How is that attorney-client
5 privilege, Mr. Woodward?

6 MR. WOODWARD: I'm not testifying,
7 Ms. Delgado. I'm happy to go off the record
8 and discuss this with you.

9 MS. DELGADO: No. I think this is going
10 to have to stay on the record for the Judge.

11 BY MS. DELGADO:

12 Q Okay. Let's do some exhibits.

13 Okay. Let's talk about alignment of
14 interest with the campaign.

15 Mr. Parscale, I'm going to show you a
16 document which is an AP article that came out
17 yesterday.

18 Did you happen to read that article?

19 **A Yes -- well, there's a bunch of versions**
20 **of it; but yes, I read several -- one of the**
21 **versions.**

22 Q Okay. Showing you a portion I
23 highlighted.

24 It says, Since last year, Campaign
25 Nucleus and other Parscale-linked companies have

1 been paid more than 2.2 million by the Trump
2 campaign, the RNC and their related political action
3 fund -- and fundraising committees, campaign records
4 show -- campaign finance records show.

5 Is that accurate?

6 MR. WOODWARD: Object to the form.

7 **A Actually, I -- I disagree with the AP's**
8 **assumption of Parscale-linked companies. I'm not --**
9 **I'm not denying that the Trump campaign is a**
10 **customer; but as you know, AJ, they like to take any**
11 **soft link of what they think I own or think I'm**
12 **partnered with and add all those totals up together.**

13 I disagree with the Parscale-linked,
14 but the AP writes what the AP writes.

15 Q But it's correct that Campaign Nucleus has
16 been paid by the Trump campaign since last year?

17 **A Yes. I just disagree with the total.**

18 Q Okay.

19 THE STENOGRAPHER: That will be Number 17.

20 MS. DELGADO: Thank you.

21 (Exhibit 17 was marked for
22 identification)

23 BY MS. DELGADO:

24 Q And then I'm going to show you -- sorry.
25 I'm going to put up the same.

1 Okay. We're going to scroll to the
2 next portion of the article. I'm just scrolling
3 down on the article.

4 Is it correct that, what it reads
5 here, that you briefly decided to quit politics
6 shortly after the January 6, right?

7 **A Actually, no.**

8 MR. WOODWARD: Object to the form.

9 **A Actually, no. I disagree with their**
10 **conflation. I -- I decided to quit politics after**
11 **my personal struggles with -- with mental health and**
12 **depression and other things and the stress from all**
13 **those years with Trump, and then -- you've moved off**
14 **from it.**

15 And then the --

16 BY MS. DELGADO:

17 Q Oh, I'm sorry.

18 **A Let me finish the question.**

19 And then the other half, I did
20 **express regret in a very private -- in a private**
21 **text message that was later exposed through some**
22 **process by the government.**

23 Q And let me ask you about Tim Dunn.

24 Tim Dunn has invested in your
25 company; is that accurate?

1 MR. WOODWARD: Objection. That's --
2 that's irrelevant.

3 BY MS. DELGADO:

4 Q Has Tim -- has Tim Dunn invested in your
5 companies?

6 MR. WOODWARD: Objection to irrelevance.

7 MS. DELGADO: It's a public record.

8 A So AiAdvertising is not my company. It's
9 my former company. So if you read that, "once
10 bought one of Parscale's firms." He invested in my
11 prior company, is -- which is my public company in
12 technology. I am a extreme minority shareholder of
13 that company now.

14 BY MS. DELGADO:

15 Q Do you know about what the \$5 million to
16 in MAGA Inc. is? What's MAGA Inc.?

17 A MAGA Inc. is a super PAC supporting
18 President.

19 Q Is that the Make America Great Again PAC?

20 A Yes. Yes.

21 Q The one that used to be the campaign?

22 MR. WOODWARD: Objection to form.

23 A I -- I didn't understand what you meant.
24 Ask that again?

25

1 BY MS. DELGADO:

2 Q Is that -- is that the one which used to
3 be Donald J. Trump for President, Inc.?

4 MR. WOODWARD: Objection to form.

5 A AJ, I don't know if that's true. I -- I
6 don't know how it was formed. I'm well away, away
7 from that stuff now.

8 Q So Mr. Dunn is -- is Mr. Dunn a Trump
9 supporter? Can I safely assume that?

10 MR. WOODWARD: Objection to form.

11 A I think you would have to ask Mr. Dunn.
12 But he's a conservative supporter, and he supports
13 multiple candidates and the President. He's been a
14 supporter of the President over the years.

15 Q Well, do you have any reason to believe
16 this is wrong? Did he not donate to a Trump PAC?

17 A Yeah. I said, Fine. You asked me why,
18 and I said I -- I don't know if he -- I don't know
19 if he loves Trump or doesn't love Trump. He did the
20 donation.

21 You'd have to ask him how much he
22 loves Trump.

23 MR. WOODWARD: Objection to form.

24 MS. DELGADO: Are you objecting to his
25 answer?

1 MR. WOODWARD: No, I'm objecting to the
2 question for the record.

3 MS. DELGADO: Okay. Could -- if you could
4 object after I've asked the question, that
5 would be helpful.

6 **A Well, I -- I answered too quickly**
7 **before -- I didn't let him -- I'm being a bad**
8 **deposee?**

9 BY MS. DELGADO:

10 Q Deponent.

11 **A Deponent.**

12 Q I think.

13 **A Thank you. I don't know.**

14 Q And is the -- as of May 7th, 2024, is the
15 Trump campaign still a client of your company,
16 Campaign Nucleus?

17 **A Yes, ma'am.**

18 Q Okay. Brad, you previously testified
19 earlier on that you had earned a -- what I believe
20 you said was a few hundred thousand from the 2016
21 campaign cycle; is that correct?

22 **A Yes.**

23 Q Okay.

24 I want to throw up another exhibit.

25 THE STENOGRAPHER: This will be 18 for the

1 record.

2 MS. DELGADO: Thank you.

3 (Exhibit 18 was marked for
4 identification)

5 BY MS. DELGADO:

6 Q Okay. Can you see that, Brad?

7 A Yeah.

8 Q Okay. It's a Daily Mail article from
9 September 11th, 2019.

10 A Yep.

11 Q And does this article ring a bell?

12 MR. WOODWARD: Object to the form.

13 A Oh, yeah.

14 BY MS. DELGADO:

15 Q Okay. Let's walk through some of this.

16 A Yeah.

17 Q Did you or an LLC or -- or company or your
18 wife buy a \$2.4 million home in Fort Lauderdale, as
19 it states here?

20 MR. WOODWARD: Object to the form.

21 A Yes.

22 MS. DELGADO: Okay. I'll take out the "as
23 it states here."

24 BY MS. DELGADO:

25 Q After the 2015 campaign, did you buy a

1 \$2.4 million home in Fort Lauderdale?

2 MR. WOODWARD: Object to the form.

3 **A Yes.**

4 BY MS. DELGADO:

5 Q Did you buy a \$78,000 BMW?

6 MR. WOODWARD: Object to the form.

7 **A I can't remember how much it was, but I**
8 **bought a BMW.**

9 BY MS. DELGADO:

10 Q Hmm?

11 **A Yes. I don't remember how much it was;**
12 **but yes, I bought a BMW.**

13 Q Okay. Do you recall the make -- the
14 model?

15 **A No. I don't remember.**

16 Q You don't have it anymore?

17 **A Nope.**

18 Q Okay. Did you buy a Range Rover?

19 MR. WOODWARD: Object to the form.

20 **A I believe I bought a Range Rover, yes.**
21 **They're conflating multiple years; but yes, I bought**
22 **a Range Rover.**

23 BY MS. DELGADO:

24 Q What year, approximately, did you buy the
25 home in Fort Lauderdale?

1 **A 2018?**

2 Q And what about the BMW?

3 **A I don't remember. Maybe '19?**

4 Q And the Range Rover?

5 **A '17 maybe?**

6 Q Okay. And what about -- what about any
7 condominiums --

8 **A Maybe '18.**

9 Q Okay.

10 **A Yes.**

11 **(Simultaneous speakers.)**

12 BY MS. DELGADO:

13 Q Did you buy any condominiums?

14 **A Yes. Bought a condo in Fort Lauderdale.**

15 Q How much was it?

16 MR. WOODWARD: Objection to relevance.

17 **A I -- I don't remember how much I spent on**
18 **it. Somewhere around a million dollars.**

19 BY MS. DELGADO:

20 Q Okay. What about -- was there any condo?
21 Just one?

22 **A One I purchased, yes. Just one.**

23 Q Okay. The article references two
24 condominiums. Do you know why?

25 MR. WOODWARD: Objection to the form.

1 **A** I have no idea. I do not have two condos.
2 **Again, this article is littered with hit-piece**
3 **mistakes and -- and completely out of context for**
4 **everything. But this was written by my enemies, and**
5 **so it's a way to make it look bad for me.**

6 BY MS. DELGADO:

7 **Q** Sure. That's why I'm asking you what's
8 correct in here.

9 **A** No, I do not own two condos there.

10 **Q** Hmm?

11 **A** They -- they conflict -- my parents and I
12 **owned the condo together with their retirement**
13 **investment, and they took the condo to be two**
14 **condos. But it was my mom and -- my parents and I**
15 **owning a condo together as an investment.**

16 **Q** And when did you and your parents buy
17 that?

18 MR. WOODWARD: Objection to relevance.

19 **A** I -- maybe somewhere around '18. All this
20 **stuff is after I left Kansas -- or I left Texas**
21 **after my kids died.**

22 BY MS. DELGADO:

23 **Q** And this is after the campaign, the 2016
24 campaign?

25 **A** Yes.

1 Q Okay.

2 A Because my kids died. I didn't -- it --
3 this has nothing to do with the campaign. This all
4 has to do with my children dying. Every single line
5 of that.

6 Q Sorry. I just want to be clear and,
7 again, apologies, which you know I've expressed
8 previously for your personal, horrible tragedy.

9 I just to be clear, though. The
10 financial aspect, are you saying has to do with
11 your -- your children -- I want to figure out if
12 you're not implying any sort of insurance.

13 A No. I'm implying that when my children
14 died, I liquidated every single asset I had in San
15 Antonio; sold everything, including everything
16 inside my house -- every car I owned, every house I
17 owned, every business I owned -- and moved to
18 Florida to try to rescue what was left of my life.

19 MR. WOODWARD: Objection to relevance.

20 MS. DELGADO: Mr. Woodward, I'm not going
21 to stop him from giving a full answer. If he
22 wishes to give a full answer, that's fine.

23 A That's the truth, so I'm happy to say it.

24 BY MS. DELGADO:

25 Q Okay. So are you saying under oath today

1 that your work on the 2016 campaign did not have any
2 bearing on your ability to make these purchases?

3 MR. WOODWARD: Objection to form.

4 Objection to relevance.

5 **A Very little difference.**

6 BY MS. DELGADO:

7 Q Is it your testimony that, under -- absent
8 your working on the Trump campaign, you would have
9 been able to make these purchases?

10 MR. WOODWARD: Objection to form.

11 Objection to relevance.

12 **A Yes, I would have.**

13 BY MS. DELGADO:

14 Q How so?

15 MR. WOODWARD: Objection to relevance.

16 **A At the time, the 2016 campaign, I owned**
17 **five homes, three companies, and sold my company for**
18 **multimillions of dollars in 2017 with nothing to do**
19 **with Trump. Walked away with millions of dollars**
20 **for my hard work over 20 years.**

21 Had nothing to do -- I actually
22 almost gave everything away for the 2016 campaign
23 and it -- probably officially lost money doing that
24 campaign because all the business I lost.

25

1 BY MS. DELGADO:

2 Q Is there any documentation given --
3 especially, as you say, that the media writes these
4 articles. Is there any documentation you can point
5 to regarding these five homes and these --

6 A Yeah.

7 Q -- multimillion-dollar businesses?

8 A There is.

9 MR. WOODWARD: Objection to form.
10 Objection to relevance.

11 A It's -- it was pretty -- it -- that's all
12 public record. You can look up the homes.

13 BY MS. DELGADO:

14 Q Okay, Brad. So -- then I want to bring
15 your attention to a quote of yours in the article.
16 And please tell me if they -- if this was a
17 fraudulent quote.

18 You say, quote, I make no secret
19 about the fact that working for the Trump family
20 made me a wealthy man --

21 A Yes.

22 Q -- well before I ever even became Trump's
23 campaign manager. The President is an excellent
24 businessman, and being associated with him for years
25 has been extremely beneficial to my family, unquote.

1 Did you --

2 MR. WOODWARD: Object --

3 BY MS. DELGADO:

4 Q -- say that?

5 MR. WOODWARD: Objection to form.

6 Objection to relevance.

7 A Yes, I did say that. But what I'm -- what
8 I'm talking about is back in -- a decade before
9 about his family, giving quotes on the record,
10 saying about my talent and about my ability to
11 perform led me to get other business and decrease my
12 business.

13 So I'm not going to shy away that my
14 relationship with the Trumps was beneficial to my
15 businesses, but I made my money on my own. It
16 didn't come from Trump.

17 BY MS. DELGADO:

18 Q But, Brad, you've said here, quote,
19 Working for the Trump family made me a wealthy man,
20 unquote.

21 MR. WOODWARD: Objection to form.

22 Objection to relevance.

23 A Yes. Yes, it's --

24 (Simultaneous speakers.)

25 A I said being associated with him for years

1 has been extremely beneficial. I didn't say get it
2 from him. I say associated with him.

3 BY MS. DELGADO:

4 Q No. No, sir. If you want to go up a line
5 where I'm reading --

6 (Simultaneous speakers.)

7 A But -- but I explain what I mean in the
8 next line. The President is an excellent
9 businessman. Being associated with him for years
10 has been extremely beneficial.

11 That's what I'm saying right now. It
12 has been the relationship, not my payments from him.
13 I almost gave him products. Almost every product I
14 gave Trump was a loss leader for me for the benefit
15 of the marketing of saying that -- that I worked for
16 him.

17 MR. WOODWARD: Please let her ask --

18 BY MS. DELGADO:

19 Q But that is --

20 MS. DELGADO: Oh, I'm sorry. Go ahead.

21 Uh-huh. I don't want to --

22 MR. WOODWARD: Please let the plaintiff
23 ask a question.

24 MS. DELGADO: Sorry. I didn't mean to cut
25 him off.

1 BY MS. DELGADO:

2 Q Go ahead, Brad. Did I cut you off?

3 **A No, I'm done.**

4 Q Okay. But that -- is that quote accurate?

5 MR. WOODWARD: Objection to form.

6 Objection to relevance.

7 **A The -- the quote is exactly as I just**
8 **said. Being associated with him for years has been**
9 **extremely beneficial to my family.**

10 I have never, ever stated that I
11 got -- I got rich off getting payments from him.

12 BY MS. DELGADO:

13 Q But you also said, quote, I make no secret
14 about -- did you say, I make no secret about the
15 fact that working for the Trump family made me a
16 wealthy man.

17 MR. WOODWARD: Objection --

18 BY MS. DELGADO:

19 Q Is that accurate?

20 MR. WOODWARD: Objection to form.

21 (Simultaneous speakers.)

22 MR. WOODWARD: Objection to relevance.

23 **A The accurate is working him -- with his**
24 **association, which is the next line.**

25

1 BY MS. DELGADO:

2 Q Sure. I think we're just -- I don't want
3 us to talk past each other and waste time. I'm just
4 saying, did you provide this quote to the Daily
5 Mail, or did they --

6 MR. WOODWARD: Objection to form.

7 A I -- I don't believe I did. I think they
8 took that from another story. But I can't remember
9 where I gave the quote.

10 Maybe.

11 BY MS. DELGADO:

12 Q Okay. Just above it, it says -- and
13 please tell me if this is wrong. It says, Parscale,
14 blah, blah, blah, told Daily Mail in an exclusive
15 chat.

16 Is --

17 MR. WOODWARD: Objection to form.

18 Objection to relevance.

19 A I don't remember. Maybe I did. This is
20 not the greatest time. Yeah, I don't know.

21 I don't remember if I did or not. I
22 thought it -- I thought that came from somewhere
23 else. Maybe I did give it to a reporter. Maybe I
24 didn't even know it was Daily Mail.

25

1 BY MS. DELGADO:

2 Q Okay.

3 A **Maybe I gave it publicly. I don't**
4 **remember.**

5 Q Well, did -- did you contact the Daily
6 Mail and say, You've attributed a quote to me
7 that --

8 (Simultaneous speakers.)

9 A **I -- I don't recall. I don't recall.**

10 BY MS. DELGADO:

11 Q It says here that you and your wife spent
12 \$2 million on two condos in Fort Lauderdale.

13 Is -- did you and your wife spend
14 \$2 million on two condos in Fort Lauderdale?

15 A **Not --**

16 MR. WOODWARD: Objection to form.

17 Objection to relevance.

18 A **Not true. We spent 500 grand on one -- on**
19 **one.**

20 BY MS. DELGADO:

21 Q Did you buy \$300,000 worth of cars?

22 MR. WOODWARD: Objection to form.

23 Objection to relevance.

24 A **I mean, I probably had debt. I don't**
25 **remember what the total was. I had to buy new cars.**

1 I sold them all in San Antonio and bought all new
2 cars.

3 BY MS. DELGADO:

4 Q Okay. And the home is beautiful.

5 A Thank you. But it's not a mansion. It
6 was -- it's a 3200-square-foot 1960s mansion.

7 Q Yeah. I'm not taking a position on their
8 description. I agree that's subjective. Just
9 asking you straight numbers.

10 Okay. Lots of pictures these people
11 put in their articles.

12 And did you also receive payments
13 from the RNC?

14 A Yes, ma'am.

15 MR. WOODWARD: Objection to form.

16 Objection to relevance.

17 BY MS. DELGADO:

18 Q Is it accurate that the RNC spent or paid
19 5.4 million to Parscale Strategy?

20 MR. WOODWARD: Objection to form.

21 Objection to relevance.

22 A I -- I don't remember. That sounds
23 accurate.

24 BY MS. DELGADO:

25 Q And is it accurate that, after the 2016

1 election, you sold your digital web company for
2 10 million?

3 **A Yes. Hence the cash.**

4 MR. WOODWARD: Objection to form.

5 Objection to relevance.

6 BY MS. DELGADO:

7 Q Who bought it?

8 **A Cloud Commerce.**

9 MR. WOODWARD: Objection to form.

10 Objection to relevance.

11 BY MS. DELGADO:

12 Q My God, these people put a lot of pictures
13 in articles.

14 Okay. Done with this one.

15 I think I might have just one other
16 one.

17 Okay. Here's another one.

18 THE STENOGRAPHER: This will be 19.

19 MS. DELGADO: Thank you, Leila.

20 (Exhibit 19 was marked for
21 identification)

22 BY MS. DELGADO:

23 Q Okay. Are you able to see this one?

24 **A Yep.**

25 Q Okay. And you know SV, do you? Correct?

1 **A Who?**

2 Q Oh, sorry. S --

3 (Simultaneous speakers.)

4 **A Yes. Yes. Of course. I know all these**
5 **people. Yeah.**

6 BY MS. DELGADO:

7 Q He's a good guy.

8 Okay. So it -- did you buy a
9 \$400,000 boat, Brad?

10 MR. WOODWARD: Objection to form.

11 Objection to relevance.

12 **A Yes, I did.**

13 BY MS. DELGADO:

14 Q When was that?

15 MR. WOODWARD: Objection to form.

16 Objection to relevance.

17 **A I don't know. Somewhere after we moved to**
18 **Florida.**

19 BY MS. DELGADO:

20 Q So that would be after the 2016 campaign?

21 **A Yes.**

22 Q Just to be clear, when did you move to
23 Florida?

24 **A Somewhere late 2017, early 2018, 20- -- I**
25 **think late 2017.**

1 Q Okay. Did you buy a Ferrari?

2 MR. WOODWARD: Objection to form.

3 Objection to relevance.

4 A Well, all those things, you say word
5 "buy." It's whether you decide, lease and debt and
6 other things, yes. I was significantly struggling
7 from the loss of my children; and my wife and I were
8 trying to do anything we could to make ourselves
9 happy, which one of that ended up working.

10 BY MS. DELGADO:

11 Q It's okay. Not questioning your rationale
12 or reasons behind these purchases, nor being
13 critical of any. Just asking about the numbers.

14 Okay. I'm just scrolling through
15 here. You're reading it at the same time I am.

16 Again, here, we have the reference to
17 the cars, which I believe we already covered. You
18 did say you had bought a Range Rover.

19 And there's just more repetition
20 there.

21 A Uh-huh.

22 Q It -- SV writes here that your firm -- and
23 I know that doesn't mean that you cleared
24 \$93 million, but your firm, is it accurate, received
25 somewhere in the ballpark of the figure of

1 93.9 million?

2 MR. WOODWARD: Objection to form.

3 Objection to relevance.

4 **A Yes.**

5 BY MS. DELGADO:

6 Q Okay. And is it accurate that the home
7 you bought, the waterfront home, the property taxes
8 alone were over \$40,000?

9 MR. WOODWARD: Objection to form.

10 Objection to relevance.

11 **A I don't know the total; but yes, probably**
12 **something around there.**

13 BY MS. DELGADO:

14 Q And do you recall the salaries on the
15 Trump campaign that -- for instance, those
16 referenced here, is it accurate that Tim Murtaugh
17 was making \$230,000? Does that --

18 MR. WOODWARD: Objection to form.

19 **A I don't remember. Sounds accurate.**

20 BY MS. DELGADO:

21 Q Okay. Would you agree with me that Trump
22 campaign salaries tend to be higher than those of
23 other campaigns?

24 MR. WOODWARD: Objection to form.

25 **A Yes.**

1 BY MS. DELGADO:

2 Q So -- and you would agree that, for some,
3 working in Trump orbit has proved to be lucrative?

4 MR. WOODWARD: Objection to form.

5 **A I can't speak to their lucrative. I can**
6 **only speak to why we had to pay more.**

7 BY MS. DELGADO:

8 Q Okay. I think that's it on this one. I
9 don't want to belabor the stats.

10 Okay. I think -- let me see if there
11 was one more.

12 Okay. Let me share this one.

13 (Exhibit 20 was marked for
14 identification)

15 BY MS. DELGADO:

16 Q Okay. This is a New York Times article,
17 Brad, from October of 2019. And it's about Katie
18 Walsh and her husband, Mike Shields. And you're
19 referenced in it, so I wanted to ask you if this is
20 correct.

21 MR. WOODWARD: Objection to form.

22 Objection to relevance.

23 **A I don't -- I don't know what -- what --**
24 **what am I asking is correct?**

25

1 BY MS. DELGADO:

2 Q Yeah, I'm getting to that. Sorry.

3 It says that Parscale Strategy
4 received nearly \$3 million from --

5 A Well, I'm looking at -- I'm looking at
6 something about my wife right here.

7 Q Take your time. You need me to scroll up
8 or down?

9 A I don't see anything about Katie Walsh on
10 the page I'm looking at. Maybe you're showing me
11 the wrong page?

12 Q No. The screen I'm sharing, it's on --
13 it's even asking me stop the share if I'd like -- is
14 a New York Times article, and I have Katie Walsh's
15 picture up?

16 A No. We're not seeing that.

17 (Simultaneous speakers.)

18 BY MS. DELGADO:

19 Q Okay. Let me stop.

20 A I see this --

21 THE WITNESS: What is that?

22 MR. WOODWARD: Serendipitous parent.

23 BY MS. DELGADO:

24 Q Weird. Okay. Let me try again.

25 How about now?

1 **A Now, I can see it.**

2 Q Okay. So this is -- let me do it again,
3 then.

4 This is a New York Times article,
5 October 23rd, 2019?

6 **A Okay.**

7 Q It's about Beltway Power Couple Katie
8 Walsh and her husband?

9 **A Yes.**

10 Q And you're mentioned in it, so I wanted to
11 ask you --

12 **A Can you make it bigger? I can't even read**
13 **it with my glasses.**

14 Q Of course. Let me see.

15 *(Sotto Voce Discussion.)*

16 BY MS. DELGADO:

17 Q Okay. So it says you received nearly --
18 Parscale Strategy received nearly 3 million.

19 **A Yeah.**

20 Q From the -- the two groups.

21 **A Okay.**

22 Q Is that accurate?

23 MR. WOODWARD: Objection to form.

24 Objection to relevance.

25 **A I don't remember the totals, and I don't**

1 **remember why. But that clearly could be accurate.**

2 BY MS. DELGADO:

3 Q Okay. And I don't think there's anything
4 else in this article -- let me see -- that I wanted
5 to ask you about. Tried to highlight just to make
6 it easier to draw your attention.

7 The article also says that the RNC
8 has paid you about 25 million since 2017. That's
9 paid Parscale Strategy, I should say, not you.

10 Is it accurate what it relays here
11 that you keep 1.5 percent of the ad purchases?

12 **A That was not accurate.**

13 MR. WOODWARD: Objection to form.

14 Objection to relevance.

15 **A The accuracy number was 1. They -- they**
16 **assumed that from somewhere. I don't -- they**
17 **don't -- they don't even give an on-the-record**
18 **statement of where they got that.**

19 BY MS. DELGADO:

20 Q Well, it's the New York Times, so I --
21 why --

22 **A I mean, New York Times has lied about**
23 **plenty of things.**

24 **It's a 1 percent. That was in the**
25 **contract of 2016.**

1 Q Sure, but if you see something in the New
2 York Times that's not accurate, did you reach out to
3 them and say, That's incorrect?

4 MR. WOODWARD: Objection to form.

5 A I mean, I -- I don't even remember this.
6 I would have had to have a full-time staff to do
7 this, and at this period -- what year is this?

8 BY MS. DELGADO:

9 Q This is, I believe -- let's see. Scroll
10 back up.

11 I believe this was October 2019, so
12 when you were at the 2020 campaign.

13 A I -- at this point, I didn't care. I
14 mean, I don't even know if I read that. I -- I had
15 more stories than I could read.

16 Q And I don't think there's anything else
17 from this article to ask you about.

18 A Yeah.

19 Q Brad, going back to the experiences you
20 had regarding --

21 A Are we done with the -- can I take my
22 glasses off?

23 Q Did I -- sorry?

24 A Are we done with the reading?

25 Q I --

1 **A** I just want to know if can take my glasses
2 off because I can't see when I'm reading.

3 MR. WOODWARD: Yes, you can take --

4 THE WITNESS: Take my glasses off?

5 *(Sotto Voce Discussion.)*

6 BY MS. DELGADO:

7 Q Brad, going back to the -- you spoke a bit
8 about the flirtatious and/or physical and/or sexual
9 overtures -- physical overtures on the campaign in
10 2016 or 2020.

11 Do you recall telling me one of those
12 was from Kellyanne Conway?

13 MR. WOODWARD: Objection to form.

14 **A** No. I -- it was not a sexual innuendo or
15 anything that would be considered that.

16 BY MS. DELGADO:

17 Q What was it?

18 MR. WOODWARD: Objection to form.

19 **A** At most, I was -- you're talking about a
20 conversation where I was joking about, you know, a
21 lot of stupid things, but the -- you know, there was
22 a moment where I thought she was being flirtation,
23 and I thought that was funny. I could be completely
24 wrong, but that was it.

25

1 BY MS. DELGADO:

2 Q Okay. I don't think I asked you --
3 although I'm sure Mr. Woodward would tell me if I
4 did -- what was your title on the campaign?

5 A My title?

6 Q Yeah.

7 A Which -- which campaign?

8 Q 2016. I'm sorry.

9 A My official title was, I believe, digital
10 director, is the one that was ever announced. But
11 internally, I kind of had several by the time the
12 end. But my official title was digital director.

13 Q And you hired the Cambridge Analytica
14 people?

15 A I was the one who -- actually, the first
16 recommendation came from Steve Bannon, and then --
17 but I am the one who ended up negotiating the deal.

18 Q Right, but you -- and what I'm trying to
19 get at is you previously described yourself as a --
20 as -- let me -- let me rephrase that so I make it
21 clearer.

22 Was Cambridge Analytica a con- --
23 somebody you -- an entity you were contracting?

24 MR. WOODWARD: Objection to form.

25 A Parscale didn't ever contract them. It

1 was -- they were contracted directly from the
2 campaign.

3 But under my title of digital
4 director, their vendor relationship fell -- fell
5 under me.

6 BY MS. DELGADO:

7 Q Got it. Okay. Okay, okay.

8 And Oz was under contract with
9 Cambridge, not with the campaign; is that correct?

10 A I don't believe that he had a separate
11 contract with the campaign. I think it was all
12 under Cambridge.

13 Q So he was an employee of Cambridge
14 Analytica?

15 A I couldn't tell you their relationship. I
16 just know that we paid Cambridge. I do not remember
17 Matt being paid anything separate from the campaign,
18 but I did -- I did not memorize the entire FEC
19 report.

20 MR. WOODWARD: Objection to form.

21 BY MS. DELGADO:

22 Q So let me just throw up on the screen a
23 second -- I think will be the last exhibit.

24 THE STENOGRAPHER: Exhibit 21.

25 MS. DELGADO: Thank you, Leila.

1 (Exhibit 21 was marked for
2 identification)

3 BY MS. DELGADO:

4 Q This is your testimony before a house
5 committee in 2017. Do you recall giving this
6 testimony to the US House of Representatives?

7 A I gave several, yes. I -- I don't
8 remember what I said, but I remember being there.

9 Q Okay. And here, you talk about hiring
10 Cambridge Analytica, her staff. You talk about Oz.

11 A Yeah.

12 Q I'm just scrolling through so you can see
13 that.

14 A Yep.

15 MR. WOODWARD: Objection to form.

16 BY MS. DELGADO:

17 Q Okay. And here, you testify -- you're
18 asked, and you say that Oz was under contract with
19 Cambridge Analytica --

20 A Yes.

21 Q -- and was an employee of Cambridge
22 Analytica.

23 MR. WOODWARD: Objection to form.

24 BY MS. DELGADO:

25 Q Is that correct?

1 A Yeah. That's what I just told you. I
2 said I just didn't know if he was paid additionally.
3 I just don't remember that. But I -- I -- I
4 remember him being under contract from Cambridge,
5 and I was required to hire Cambridge to hire him.

6 Q So he was never contracted by the
7 campaign. He was an employee of Cambridge
8 Analytica?

9 MR. WOODWARD: Objection to form.

10 A Yes. But what I'm saying is some people
11 towards the end might have gotten separate
12 contracts. Some things, I don't remember. I'm just
13 saying, as I remember, he was just under Cambridge.
14 But I don't memorize the entire FEC report.

15 If he's not on the FEC report, then
16 that was the only way he was hired.

17 BY MS. DELGADO:

18 Q Of course.

19 I'm only asking because, when I had
20 asked you about staffers and independent contractors
21 of the campaign who didn't go into the
22 administration or the White House, you had mentioned
23 Oz.

24 A Oh.

25 (Simultaneous speakers.)

1 BY MS. DELGADO:

2 Q That's why I'm asking. It's not a trick
3 question.

4 A He was treated -- he was treated as a
5 subcontractor.

6 Q Okay. Fair enough -- exactly. Okay.
7 That's -- that's -- it's not a trick question.
8 That's why I was asking.

9 Okay. And you also mentioned -- oh,
10 sorry. I took it off.

11 There were -- there were three others
12 besides Oz from cam- -- who were Cambridge Analytica
13 subcontractors. Does that sound right?

14 A I believe all together was -- it's been a
15 long time since I told this story, but I believe it
16 was four or five total people came from Cambridge
17 Analytica. And if you look at how much money we
18 spent per month, that was for salaries for them for
19 staffed.

20 The press was always false in saying
21 that I hired Cambridge Analytica for data work.
22 That's always been the perpetual lie from the left.

23 Q Sorry. What was the lie?

24 A The lie is that we used Cambridge
25 Analytica data to target voters is a complete lie.

1 We never used any of their data. We only hired them
2 for staff.

3 But when you tell me earlier the New
4 York Times doesn't lie, you can Google New York
5 Times, and they say that a hundred times, which is a
6 lie.

7 Q Well, I didn't say the New York Times
8 doesn't lie. I...

9 A Okay.

10 Q Okay. Just --

11 A I'm just saying they like to -- they like
12 to, you know, squiggle the truth.

13 Q Sure.

14 And most of those folks were in
15 San Antonio, right?

16 A At the beginning. But eventually, when I
17 started going to New York, I split the team between
18 New York and San Antonio. When you --

19 Q And you --

20 A -- start seeing the war room, I -- they
21 start coming to my office.

22 Q Okay. And you referenced earlier that
23 Cambridge Analytica's data was -- was not what they
24 were hired for, but rather staff.

25 A Right.

1 Q That leads me to another question.

2 Was there some tension in the last
3 few days of the campaign or shortly thereafter
4 regarding Cambridge Analytica attempting to take
5 credit for your work?

6 MR. WOODWARD: Objection to form.

7 THE WITNESS: I can answer this, right? I
8 love this question.

9 A The -- yes.

10 BY MS. DELGADO:

11 Q It's just interesting to me.

12 A Of course.

13 Yes. The -- it wasn't -- it was
14 after the campaign, so I -- when -- what you're
15 discussing have occurred months later -- or not
16 month later. Like, I think a few weeks later, they
17 got up on stage and were like, We're the geniuses
18 who got Trump elected. And I was like, What? I
19 don't even know who you are.

20 And then they made this stupid movie
21 called The Great Hack with a woman that I don't even
22 who is and no one's ever met. And Netflix set this
23 entire narrative of office, Cambridge Analytica did
24 all this secret stuff with -- and it was all false.
25 It was a -- entirely, just a fake movie.

1 BY MS. DELGADO:

2 Q Right.

3 A **Thank you for that question.**

4 Q That's okay. Glad you can establish the
5 record correcting here. Okay.

6 MS. DELGADO: Okay. I think -- we're
7 close to being done. Like I side, this
8 deposition, I got a good chunk of what I needed
9 in the original Part 1, so this was probably
10 not going to take the full three hours. But
11 thanks, everyone, for your patience.

12 If you want to take a quick five-minutes
13 break, I'm just going to go through and see
14 what remains. But we'll probably be done in
15 the next 15 minutes or so.

16 Okay. Off the record for five minutes.

17 THE STENOGRAPHER: Off the record.

18 (Recess.)

19 BY MS. DELGADO:

20 Q I just have a couple more questions, Brad,
21 and then we will be done.

22 A **No more documents?**

23 Q One more. And --

24 A **I'll keep my glasses -- I'll keep my**
25 **glasses open.**

1 Q Okay. Thank you.

2 Okay. Let's see here. Go back to
3 the Zoom window.

4 (Exhibit 22 was marked for
5 identification)

6 MS. DELGADO: Is everybody able to see
7 this? It's from FEC.

8 **A Yeah. Hold on. Yep.**

9 BY MS. DELGADO:

10 Q Okay, Brad. These are payments dated
11 November 2020 --

12 MS. DELGADO: Oh, and, Leila, sorry. I'm
13 marking this as an exhibit.

14 BY MS. DELGADO:

15 Q These are payments to the Law Firm of
16 Kasowitz Benson Torres.

17 **A Okay.**

18 Q Starting November 2020 through
19 January 2022.

20 **A Okay.**

21 Q And, Brad, as you'll see, some are from
22 the RNC, but some are from the 2016 and 2020
23 campaign, which was Donald J. Trump for President,
24 Inc., which later became what you see there called
25 Make America Great Again PAC.

1 **A Okay.**

2 Q I wanted to ask you, for the ones that are
3 from Donald J. Trump for President, Inc. and/or Make
4 America Great Again PAC, do you have any knowledge
5 as to what these payments were for?

6 **A I wouldn't have -- I don't have any -- I**
7 **had no involvement with any money spent since summer**
8 **of 2020.**

9 MR. WOODWARD: Object to the form.

10 THE WITNESS: Sorry.

11 **A I have no transparency to anything**
12 **since -- since the summer of 2020.**

13 BY MS. DELGADO:

14 Q Do you know why Kasowitz Benson Torres
15 would have received a \$2.5 million single payment in
16 the 2000 for the election?

17 MR. WOODWARD: Object to the form.

18 **A I actually have no idea.**

19 BY MS. DELGADO:

20 Q Okay. Fair enough.

21 And you testified earlier that the --
22 what you called the, quote, litigation, unquote, was
23 not the sole reason I wasn't brought on for the 2020
24 team; is that correct?

25 **A Is this from last deposition?**

1 Q From --

2 MR. WOODWARD: Object to the form.

3 BY MS. DELGADO:

4 Q From earlier.

5 Is --

6 A Earlier -- earlier today or earlier last
7 time?

8 Q Last time. Did --

9 A Okay.

10 Q Am I remembering correctly that you
11 testified that the -- that the -- what you called
12 the, quote, litigation was not the sole reason?

13 A I mean, I -- I would say that still today.
14 Yes, I would say it was a reason.

15 Q And the other reason you gave, am I
16 correctly recalling, was that you had been told that
17 I had, quote, flipped, unquote on the President?

18 A That was one of -- of -- yes. I had
19 received different opinions from different people on
20 things, and I believe the strongest two were that
21 you had turned on the President and -- politically
22 and were opposing him. And the other one was
23 something about being litigious -- litigate- --
24 litigious -- litagious?

25 THE WITNESS: Which one is it?

1 MR. WOODWARD: Litigious.

2 **A Litigious. Litigious. I remember that.**

3 BY MS. DELGADO:

4 Q Did -- did you have or do you have any
5 documentation of referencing any reason other than
6 the, quote/unquote, litigation?

7 **A Can you ask that again? Sorry. I...**

8 Q Yeah.

9 Is -- does any paper trail or any
10 documentation or any e-mail exist that you know of
11 or could possibly even produce in which you detail a
12 reason other than the, quote/unquote, litigation?

13 MR. WOODWARD: I'm going to object again,
14 Ms. Delgado. You asked him about this in his
15 prior deposition on Page 73.

16 But why don't you go ahead and answer,
17 Brad.

18 **A I believe all this was done in person. I**
19 **don't think -- there was no written chain about you.**
20 **This was done -- I mean, it was honestly done very**
21 **quickly, as -- if I remember, just a brief -- few**
22 **brief conversations. And I don't think you and I**
23 **ever spoke directly about it.**

24 BY MS. DELGADO:

25 Q Did you have any -- have you personally

1 been aware or were aware of anything indicating that
2 I had, quote/unquote, flipped?

3 MR. WOODWARD: Object to the form.

4 A Can you ask that again? I don't know what
5 you mean. You asked me if I -- I saw evidence?

6 BY MS. DELGADO:

7 Q Correct.

8 A I can't remember if I did. I probably
9 would have accepted some of those people just on
10 their word at that point.

11 Q Okay.

12 A But I don't recall if somebody handed me a
13 piece of paper eight -- six years ago. I just
14 don't.

15 THE WITNESS: Says we're the host now. We
16 lost the -- we lost the court reporter.

17 *(Technical interruption.)*

18 *(Discussion off the record.)*

19 BY MS. DELGADO:

20 Q Okay. Brad, were you aware that I sent
21 your -- one of your attorneys, Mr. Woodward, a
22 proposed affidavit in lieu of a deposition? In
23 other words, an affidavit so -- as an alternative to
24 being deposed?

25 MR. WOODWARD: I'm going to -- I'm going

1 to object to any answer other than whether he
2 is aware on the grounds of privilege.

3 **A Yes.**

4 BY MS. DELGADO:

5 Q Okay. So I'm going to -- let's see.

6 MS. DELGADO: I'm going to admit that as
7 an exhibit.

8 THE STENOGRAPHER: Be 23.

9 MS. DELGADO: That'll be 23.

10 (Exhibit 23 was marked for
11 identification)

12 BY MS. DELGADO:

13 Q Let me -- I'm just going to share the
14 screen. This is the e-mail to your counsel.

15 Why are you looking at your counsel?

16 **A I'm -- they're whispering, so I was --**

17 Q Any conversation happening I should hear?

18 **A I can't hear it, so...**

19 Q Okay. So this is the e-mail and then the
20 attachment. I'm just showing on the screen for open
21 transparency what it is I'm submitting as an -- as
22 an exhibit, okay? Just for transparency purposes.
23 Your attorney, Mr. Woodward, has a copy of this
24 because this is an e-mail correspondence with him
25 directly. And it's from September 4th, 2023.

1 And then I'm --

2 **A Okay.**

3 Q Okay. Also, in full transparency, I'm
4 going to also put in the -- what was attached to
5 that.

6 Did you see the e-mail? When you say
7 you're aware, did -- did you review the affidavit?

8 **A I -- I don't know. I don't remember.**
9 **Actually, if I saw -- I remember talking on the**
10 **phone about it.**

11 **I believe he called me because I was**
12 **on the road.**

13 Q Okay. And then, this is -- I'm going to
14 mark this --

15 MS. DELGADO: I don't even know to mark
16 this as a separate exhibit, Leila, because it's
17 the attachment to that e-mail. So...

18 THE STENOGRAPHER: It might -- for
19 clarity's sake, it might be easier. Or if you
20 want to make it, like, 23B, we can do that,
21 but -- for marking purposes, it tends to be
22 cleaner just to mark it as a new exhibit unless
23 you want to make it a composite.

24 MS. DELGADO: Oh, what -- it's fine either
25 way. I mean, it's pretty clear. It's the

1 attachment of it follows the other one.

2 THE STENOGRAPHER: Let's do it as 24,
3 then.

4 (Exhibit 24 was marked for
5 identification)

6 MS. DELGADO: Okay. And so this is --
7 this is the attachment, and I'll just submit
8 this as an exhibit.

9 BY MS. DELGADO:

10 Q So, Brad, did you roughly have an idea
11 what you were going to be asked at the deposition?

12 MR. WOODWARD: I'm going to object on
13 privileged grounds.

14 MS. DELGADO: No, I'm not asking anything
15 about conversations with you. I'm asking if he
16 knew what he was going to be asked about.

17 BY MS. DELGADO:

18 Q Nothing to do with any conversation, any
19 thoughts from your attorney.

20 MR. WOODWARD: I'm going to object --
21 object on the basis of attorney-client
22 privilege and instruct the witness not to
23 answer.

24 BY MS. DELGADO:

25 Q Have you seen this affidavit, Brad?

1 **A I -- I don't --**

2 MR. WOODWARD: I'm going to object as to
3 form.

4 **A I don't recall reading this. Again, I**
5 **think he called me and read me parts of it.**

6 I don't remember. I don't think I
7 saw the whole thing. Some of this, I'm not
8 recognizing right now.

9 Q And approximately when would it have been
10 that Mr. Woodward, quote, called you and read parts
11 of it, unquote?

12 **A I don't -- a year ago?**

13 Q Like, what month?

14 **A I -- AJ, I have no idea. It was a while**
15 **ago.**

16 Q Last year?

17 **A Maybe. I don't remember. Sometime during**
18 **the period of time where -- before you asked me to**
19 **subpoena sometime I knew the case was going on,**
20 **somewhere last year maybe? I really don't remember.**

21 Q Okay. Fair enough.

22 Sometime prior to this deposition.

23 **A Yes. Prior to this deposition and since**
24 **2016.**

25 Q Okay. We have enough.

1 Brad, from your understanding of
2 2016, did Donald Trump select individuals for White
3 House jobs.

4 MR. WOODWARD: Objection to the form.

5 A I really did not have anything to do with
6 transition. I -- I had nothing to do with it.
7 Almost absolutely nothing. I made a couple
8 suggestions to people. I got asked for a couple
9 reviews. And that -- that all probably happened the
10 first couple days, and I had nothing to do with it
11 after that.

12 I never saw Trump at the transition
13 office at Trump Tower, so -- and I wasn't privy to
14 any of the meetings upstairs.

15 BY MS. DELGADO:

16 Q I'm just looking through to see if
17 anything remains. I don't think so.

18 The conversations you had about
19 2020 -- about my joining the 2020, was that -- was
20 it Katrina Pearson who reached out to you and said
21 AJ's interested in joining the campaign?

22 A I believe that my recollection is that the
23 first person I heard you about was Katrina. That
24 would have been the most likely also.

25 Q When you "the first," was there another

1 person?

2 A I just don't remember if other people said
3 it. What I'm saying is somebody else could have
4 come -- Megan Powers or somebody else could have
5 come said something to me. The memory I remember is
6 Katrina.

7 Q Who is Megan Powers?

8 A Just some -- a -- she was, like, director
9 of operations.

10 Q Did she also handle HR type of duties?

11 MR. WOODWARD: Object to the form.

12 A Yes. Yeah. She would help.

13 I don't remember exactly when she
14 kind of stepped out of that role and I kind of made
15 more of an official HR department, but...

16 She was kind of the one I designated
17 to handle onboarding. I don't know if it was
18 hiring, but onboarding, which is different than
19 hiring.

20 She would do some hiring, some
21 onboarding. Just depended on the level of the
22 position. Some I would handle. I'd only handle the
23 top ones. Then someone would handle below, and --
24 just there was different people at different levels.

25 Q Was there anyone else who would hire

1 onboarding individuals besides Megan?

2 **A** **Yes. There would have been several --**
3 **it -- we allowed a lot of the hiring to happen per**
4 **department. There was different things that --**
5 **that -- it just depended on how level the position**
6 **was. High level.**

7 **Q** **And if somebody had a complaint about**
8 **mistreatment, who typically would they have gone to**
9 **on the campaign?**

10 **A** **My recollection is would be Glassner or --**
11 **Michael Glassner or Alex Cannon, Sean Dollman, those**
12 **kind of people. Maybe not Sean, but Alex -- I would**
13 **say Alex and Glassner would have been the -- the two**
14 **key people that I would have sent them to or**
15 **somebody would have reached out to.**

16 **Q** **Why Glassner? What was his role?**

17 **A** **He was just a high level -- I can't**
18 **remember what his title was, honestly. I think it**
19 **might have been deputy -- yeah, what was his title?**

20 **I don't remember his title, but he**
21 **was a -- he was one of the originals. I call them**
22 **the OGs. You know, the -- been with the campaign a**
23 **long time. He handled a lot of the litigation and**
24 **the management of our litigation.**

25 **He would have known the lawyers,**

1 known the people to talk to. He was an older adult
2 with lots of experience. Just good, calm voice; all
3 those kinds of things. Somebody that would have
4 handled it with -- if something would've happened,
5 handled with the right kind of dignity that I would
6 expect.

7 Q And what was his title?

8 A I can't remember, AJ. I really can't.
9 I'm so bad with titles. I'm lucky I remember mine.

10 Q And Alex was an attorney, right?

11 A I don't know his official role with the
12 campaign was, but he is an attorney. And has been
13 an attorney for the campaign prior. I don't know
14 what the capacity in how his contracts were. I -- I
15 expected him to handle legal matters for the
16 campaign.

17 Q So did he work with Justin Clark?

18 A I couldn't -- I never really thought of
19 Justin Clark as an attorney in the campaign. I
20 thought of him as a political adviser.

21 Q Okay.

22 A Well, I think -- I believe that role
23 changed after I left, but I can't -- I don't know
24 for sure.

25 When I was there, he was more of a

1 political person.

2 Q Okay.

3 A He might have handled some small legal
4 issues, but I don't remember any of those. That
5 might have been -- that's a question to ask Glassner
6 or somebody else that was dealing with litigation.

7 Q Okay. Hold on one second.

8 Okay. Just going to show you...

9 I'll throw this up on the screen last
10 thing.

11 So that's a reference to Justin
12 Clark, if you can --

13 A Yes.

14 Q -- see in -- in Reuters.

15 A Yep.

16 Q November 2020 as senior counsel and a
17 lawyer.

18 So is it possible that he took on the
19 legal role after you left, is what you're saying?

20 A As I --

21 MR. WOODWARD: Object to the form.

22 A As I read the stories myself, looks like,
23 as it closer to election day or after election day,
24 it took more of a legal thing. It -- in the
25 capacity with me, it was more about building a

1 political structure for election integrity, not
2 actually being a legal counsel for us.

3 As I remember --

4 Q Right.

5 A As -- for me, as I remember his role, that
6 was his role. I believe later, from reading
7 stories, the same as you, that he became more of an
8 attorney for -- for the campaign.

9 But that doesn't mean he already had
10 some contract I didn't know about.

11 Q Right.

12 So what you're saying is he would --
13 he would wear different hats depending on who he was
14 dealing with.

15 MR. WOODWARD: Object to the form.

16 BY MS. DELGADO:

17 Q Is that accurate?

18 A Yes, ma'am.

19 And I -- when I was campaign manager,
20 I do not remember him really having a legal role.

21 Q And you were the campaign manager until
22 what month, Brad?

23 A I believe July 20- -- somewhere late July.
24 I don't know. I try to forget the day.

25 Q Okay.

1 MS. DELGADO: I don't think I have
2 anything else. So I think --

3 THE STENOGRAPHER: I'm sorry, AJ. You
4 want to make this an exhibit?

5 MS. DELGADO: Yes, please.

6 THE STENOGRAPHER: Okay. That'll be 25.

7 (Exhibit 25 was marked for
8 identification)

9 BY MS. DELGADO:

10 Q Oh, Brad, one more thing. Do you intend
11 to keep the Trump campaign as a client of Campaign
12 Nucleus through the election?

13 MR. WOODWARD: Object to relevance.
14 Object to the form.

15 **A I plan to keep any person on the**
16 **Republican side that wants to do business with me**
17 **and conservative side, to keep them as clients, yes.**

18 Q Okay.

19 MS. DELGADO: Thank you.

20 That's it, folks. Thank you so much.

21 MR. WOODWARD: Can we take a minute -- can
22 we take a minute to see if we have anything?

23 MS. DELGADO: Of course.

24 MR. WOODWARD: All right. Hang on.

25 Let's go off the record.

1 THE STENOGRAPHER: Off the record.

2 (Recess.)

3 THE STENOGRAPHER: Back on the record.

4 MR. WOODWARD: Nothing on behalf of
5 Mr. Parscale other than that we will designate
6 his deposition transcript as confidential under
7 the protective order.

8 MS. DELGADO: Just for the record,
9 Mr. Woodward, you already know. We don't need
10 to argue. Just for the transcript purposes,
11 I've already explained to Mr. Woodward the
12 confidentiality order doesn't allow a third
13 party to designate. Nonetheless, I have no
14 intention of sharing the deposition, as I
15 already stated in our e-mail last night. So we
16 can leave it at that.

17 (Discussion off the record.)

18 MR. WOODWARD: And we will read and sign,
19 Madam Court Reporter.

20 (The deposition was concluded at
21 12:37 p.m.)

22

23

24

25

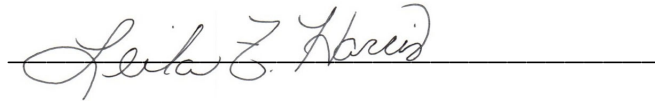
CERTIFICATE OF OATH

STATE OF FLORIDA)

COUNTY OF WALTON)

I, the undersigned authority, certify
that BRADLEY PARSCALE remotely appeared before me
and was duly sworn.

WITNESS my hand and official seal
this 7th of May, 2024.



Leila Z. Harris, Stenographic Court Reporter

Notary Public - State of Florida

Commission No: HH 144004

My Commission Expires: September 13, 2025

1 STATE OF FLORIDA)

2 COUNTY OF WALTON)

3 I, Leila Z. Harris, LCR (Tennessee), Court
4 Reporter, certify that I was authorized to and did
5 stenographically report the foregoing deposition;
6 and that the transcript is a true record of the
7 testimony given by the witness; Per Federal Civil
8 Procedure Rule 30(e) deponent witness did request to
9 read and sign transcript.

10 I further certify that I am not a
11 relative, employee, attorney, or counsel of any of
12 the parties, nor am I a relative or employee of any
13 of the parties' attorney or counsel connected with
14 the action, nor am I financially interested in this
15 action.

16
17 

18 _____
19 Leila Z. Harris, LCR, FPR
20 Stenographic Court Reporter
21
22
23
24
25

1 Please attach to the 5/7/25 deposition of BRADLEY
2 PARSCALE in the case of Delgado vs. Trump.

3 INSTRUCTIONS: Please read the transcript of your
4 deposition and make note on this page of any
5 changes. Do not mark on the transcript itself.
6 Please sign and date this sheet.

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ERRATA SHEET

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Under penalties of perjury, I declare that I have
read my deposition and that it is true and correct
subject to any changes in form or substance entered
here.

DATE

BRADLEY PARSCALE

Reporter LZH

Jeannie Reporting
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Miami, Florida 33130
(305) 577-1705

May 21, 2024

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RE: Delgado v Trump

Dear Mr. Parscale

Attached please find attached a complimentary copy of your deposition which was taken in the above-styled cause on 5/7/24. Also attached is an Errata Sheet to be completed by you when reading your copy of the deposition. Sign below to waive review of the transcript.

After you have completed the Errata Sheet, please return it via email to leila@jeanniereporting.com for inclusion in the original transcript. It is suggested that the review of this transcript be completed within 30 days of your receipt of this letter, as considered reasonable under Federal Rules; however, there is no Florida Statute to this regard.

The original of this transcript has been forwarded to the ordering party and your errata, once received, will be forwarded to all ordering parties for inclusion in the transcript.

1 Sincerely,

2

3

4 Leila Z. Harris, Stenographic Court Reporter

5 cc: AJ Delgado, Pro Se Plaintiff

6

7

8 Waiver:

9

10 I, _____, hereby waive the reading &
11 signing of my deposition transcript.

12

Deponent Signature _____

_____ Date

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{PLAINTIFF} v.
{DEFENDANT}{WITNESSNAME}
{DATE}

<p>BY MS. DELGADO: [165] MR. BLUMETTI: [9] 134/8 141/20 142/2 142/7 148/16 153/22 156/20 177/8 185/21 MR. WOODWARD: [164] MS. DELGADO: [73] 133/23 134/5 134/9 134/19 141/22 141/24 142/11 144/22 146/3 146/23 149/22 154/17 159/21 163/6 163/9 163/12 163/15 164/6 165/4 184/18 185/1 185/9 185/11 185/16 185/22 186/3 186/7 186/13 186/24 187/6 187/9 187/14 187/17 188/1 188/5 188/9 188/16 189/8 189/11 189/16 190/2 190/13 190/19 191/10 194/22 194/25 195/4 195/9 196/20 198/7 199/24 200/3 201/2 201/22 205/20 209/20 209/24 214/19 225/25 231/6 232/6 232/12 237/6 237/9 238/15 238/24 239/6 239/14 247/1 247/5 247/19 247/23 248/8 THE STENOGRAPHER: [20] 133/7 142/5 142/8 149/20 163/10 163/19 188/13 188/15 196/19 200/25 214/18 225/24 231/17 237/8 238/18 239/2 247/3 247/6 248/1 248/3 THE WITNESS: [15] 133/6 147/20 163/8 163/13 163/17 177/7 185/15 191/8 191/12 219/21 223/4 230/7 233/10 234/25 236/15</p> <p>\$</p> <p>\$2 [2] 212/12 212/14 \$2 million [2] 212/12 212/14 \$2.4 [2] 201/18 202/1 \$2.4 million [2] 201/18 202/1 \$2.5 [1] 233/15 \$2.5 million [1] 233/15 \$230,000 [1] 217/17 \$3 [1] 219/4 \$3 million [1] 219/4 \$300,000 [1] 212/21</p>	<p>\$40,000 [1] 217/8 \$400,000 [1] 215/9 \$5 [1] 198/15 \$5 million [1] 198/15 \$78,000 [1] 202/5 \$93 [1] 216/24 \$93 million [1] 216/24</p> <p>'16 [1] 162/11 '17 [1] 203/5 '17 maybe [1] 203/5 '18 [3] 147/5 203/8 204/19 '19 [3] 147/5 182/18 203/3 '20 [2] 162/14 182/18 '24 [1] 185/5</p> <p>- -and [2] 130/19 252/10</p> <p>1</p> <p>1 percent [1] 221/24 1.5 percent [1] 221/11 10 million [1] 214/2 10006 [1] 130/11 1065 [1] 130/3 10:00 [1] 129/14 11764 [1] 129/3 11th [2] 131/13 201/9 12:35 [1] 129/14 12:37 [1] 248/21 13 [1] 249/15 14 [2] 149/21 149/23 144004 [1] 249/14 15 [3] 163/11 165/6 231/15 16 [1] 166/5 16th [2] 131/7 150/12 17 [2] 196/19 196/21 1705 [1] 252/2 18 [2] 200/25 201/3 19 [2] 214/18 214/20 19-CV-11764 [1] 129/3 1960s [1] 213/6</p> <p>2</p> <p>2.2 million [1] 196/1 20 [4] 206/20 215/24 218/13 246/23 2000 [1] 233/16 20006 [2] 130/16 252/7 2001 [2] 130/16 252/6 2015 [4] 131/7 140/13 150/11 201/25 2016 [35] 131/9 136/11 139/7 139/12 139/17 140/22 146/7 149/12 155/3 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25-year [1] 180/18 28 [1] 252/1</p> <p>3</p> <p>3 million [1] 220/18 30 [2] 250/8 252/21 305 [1] 252/2 3200-square-foot [1] 213/6 32nd [1] 130/10 33130 [2] 130/4 252/2 3400 [1] 130/4</p>	<p>4</p> <p>40 [1] 130/10 425 [2] 130/21 252/12 4831 [1] 130/11 49 [1] 188/19 4th [1] 237/25</p> <p>5</p> <p>5.4 [1] 213/19 5/7/24 [1] 252/17 5/7/25 [1] 251/1 500 [1] 212/18 577-1705 [1] 252/2</p> <p>6</p> <p>609 [1] 130/3 610 [1] 252/1 6166 [2] 130/21 252/12</p> <p>7</p> <p>7049 [2] 130/17 252/7 73 [1] 235/15 7th [2] 200/14 249/9</p> <p>8</p> <p>8553 [2] 130/22 252/13 8th [1] 130/3</p> <p>9</p> <p>90 percent [1] 171/11 93.9 million [1] 217/1</p> <p>A</p> <p>above-styled [2] 129/21 252/17 absent [1] 206/7 absolutely [2] 135/7 241/7 accepted [1] 236/9 according [2] 150/25 152/23 accuracy [1] 221/15 accurate [24] 141/3 142/24 159/21 166/14 167/12 167/16 196/5 197/25 210/4 210/19 210/23 213/18 213/23 213/25 216/24 217/6 217/16 217/19 220/22 221/1 221/10 221/12 222/2 246/17 accusations [1] 165/25 acting 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<p>W</p> <p>witness' [2] 185/19 190/4</p> <p>woman [6] 141/1 141/6 141/13 145/22 151/11 230/21</p> <p>women [7] 137/22 141/19 142/15 142/17 160/5 160/9 177/13</p> <p>WOODWARD [19] 130/15 130/15 131/21 134/4 185/22 187/10 188/18 190/10 191/1 195/5 205/20 224/3 236/21 237/23 240/10 248/9 248/11 252/5 252/6</p> <p>Woodward's [1] 188/25</p> <p>word [8] 147/15 147/19 151/23 156/7 156/8 162/22 216/4 236/10</p> <p>worded [1] 139/20</p> <p>words [2] 152/12 236/23</p> <p>works [1] 169/5</p> <p>world [1] 184/12</p> <p>worries [1] 135/12</p> <p>worth [3] 157/18 163/2 212/21</p> <p>would've [2] 182/5 244/4</p> <p>writes [4] 196/14 196/14 207/3 216/22</p> <p>written [3] 171/25 204/4 235/19</p> <hr/> <p>Y</p> <p>year [12] 140/8 140/15 141/2 147/4 180/18 195/24 196/16 202/24 222/7 240/12 240/16 240/20</p> <p>years [14] 140/5 162/15 172/1 176/25 182/13 197/13 199/14 202/21 206/20 207/24 208/25 209/9 210/8 236/13</p> <p>yeses [1] 158/21</p> <p>yesterday [1] 195/17</p> <p>YORK [19] 129/2 130/11 131/16 172/15 172/17 172/19 190/23 191/5 218/16 219/14 220/4 221/20 221/22 222/2 229/4 229/4 229/7 229/17 229/18</p> <p>you-all [1] 154/8</p> <p>young [1] 138/13</p> <hr/> <p>Z</p> <p>Zoom [5] 134/1 134/20 149/18 176/20 232/3</p>				
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